

The importance of SEO Affiliate Marketing for the Finnish regulated online gambling market

Based on experiences in the Dutch regulated online gambling Market

Adress:

Euclideslaan 1, 3584 BL Utrecht, Nederland

Company Number:

73716855

Contact:

E: info@qmra.eu / application@qmra.eu

T: +3130 – 227 03 86

S. G. Vrolijk, LL.M.

Quality Mark Responsible Affiliates

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1. Introduction

The Dutch regulated market for iGaming opened on the first of October, 2021. Based on the Dutch Online Gambling Act,¹ marketing was (and in part still is) allowed.² Policy, as set up by the Dutch Gambling Authority (Kansspelautoriteit), explains marketing should always attribute to guiding players to licensed online gambling platforms:³

“When shaping recruitment and advertising activities in a careful and balanced manner as referred to in Article 4a of the Act, the Board of Directors understands this to mean, at a minimum, that the recruitment and advertising activities of a license holder:

- a. align with the channeling objective of the Act **by guiding consumers towards the legal gambling offerings and steering them away from illegal gambling offerings.**”*

Affiliate marketing was (and still is) one of the legal acquisition tools for licensed online gambling platforms.

Advertising via TV and radio commercials, outdoor billboards, and print media was no longer permitted. However, targeted online advertising remained allowed.

1.1. A Dutch Quality Mark for Affiliate Marketing

Before the Dutch regulated market opened, there were a lot of affiliate websites, promoting the unregulated online gambling market. To ensure a safe environment for Dutch consumers, the Quality Mark for Dutch Affiliates (KVA)⁴ was launched. The aim has been to professionalize the online casino affiliate sector, for which providing a **clear definition of a bookmaker / casino (informative) affiliate** is appropriate:

A casino affiliate operates an online platform (a website or multiple websites) where targeted information about online casinos and bookmakers is published. This can include casino reviews, informational articles, news updates, and more. Generally, the website serves as the foundation of the casino affiliate. Additionally, affiliates may engage in promotional activities on social media platforms (which may also include video content).

By achieving strong organic visibility for relevant casino-related search terms, users are directed to these websites. The affiliate then enters into agreements with various online gambling providers. If a user clicks through from an affiliate website to a provider, this referral is tracked. The affiliate subsequently receives compensation from the provider.

¹ The ‘Wet Kansspelen op afstand’, an addition to the ‘Wet op de Kansspelen’ <https://wetten.overheid.nl/BWBR0002469/2022-10-01>, containing specific clauses in ‘Besluit Kansspelen op afstand’ (the Dutch Online Gambling Decree) <https://wetten.overheid.nl/BWBR0044773/2022-07-15>, 12-1-2025.

² The Dutch Online Gambling Decree for marketing and addiction prevention, <https://wetten.overheid.nl/BWBR0033412/2023-07-01>, 12-1-2025.

³ Article 2.2. of the ‘Beleidsregels verantwoord spelen’ (Dutch Policy for responsible gambling by the Kansspelautoriteit), <https://zoek.officielebekendmakingen.nl/stcrt-2024-18177.html>, 12-1-2025.

⁴ Keurmerk Verantwoorde Affiliates, <https://kva.nl/>, 12-1-2025.

KVA is based on the KVA Code (accessible on the website), which is derived from gambling laws and regulations relevant to affiliates. The KVA Code addresses the following topics:

1. Contributing to channeling objectives: no promotion of illegal offerings;⁵
2. Responsible use of channels (including the addition of the slogan "What does gambling cost you? Stop in time. 18+");
3. Ensuring careful and balanced design of communications;⁶
4. Preventing misleading information;⁷
5. Aligning communications with addiction prevention;⁸
6. Adhering to the prohibition on untargeted advertising for remote gambling.⁹

When affiliates register with KVA, legal experts from the KVA team draft a report identifying any shortcomings in compliance with relevant laws and regulations. Revision rounds are conducted until the affiliate fully complies with the KVA Code. Once an affiliate meets the requirements of the KVA Code, they will receive certification and be recognized as a KVA member. The KVA team conducts regular checks to ensure ongoing compliance.

As KVA has been a very successful initiative in the Dutch market, an international version of the Quality Mark was launched: Quality Mark Responsible Affiliates.¹⁰ QMRA is available for various regulated markets.¹¹

1.2. Affiliate marketing for the Finnish regulated market

Finland is opening a regulated online gambling market, potentially including a ban on affiliate marketing. Drawing from our extensive experience with the Dutch market, this report highlights the risks associated with such a ban. We will examine the Dutch case to illustrate these risks and their potential impact.

2. The importance of SEO affiliate marketing for regulated markets

Unregulated online casinos present a significant challenge in virtually all European (and even global) online gambling markets. For instance, the European Gaming & Betting Association (EGBA) has voiced its concern regarding Italy's black market for online gambling, which is estimated to generate nearly €1 billion annually. The EGBA concluded that the ban on gambling advertising is, in this case, clearly benefiting the black market.¹²

⁵ Article 2.2. sub a, Dutch Responsible Gambling Policy

⁶ Article 2.2. sub b, Dutch Responsible Gambling Policy

⁷ Article 2.3 and 2.4, Dutch Responsible Gambling Policy

⁸ Article 2.3., 2.5., 2.6., Dutch Responsible Gambling Policy and the Dutch Decree for marketing and addiction prevention

⁹ Article 2ab of the Dutch Decree for marketing and addiction prevention

¹⁰ <https://qmra.eu/>, 12-1-2025.

¹¹ <https://qmra.eu/active-markets/>, 12-1-2025.

¹² <https://www.egba.eu/news-post/egba-concern-at-reported-size-of-online-gambling-black-market-in-italy/>, 20-1-2025.

In the Netherlands, unregulated online casinos also pose a significant threat. To understand the extent of these illegal activities, extensive research was conducted by KVA in October 2023.¹³ The report highlights the operations of unregulated online casinos, which act in clear violation of ethical standards.

2.1. KVA Research on unregulated activities in the Netherlands (29-10-2023)

This report analyzes 30 illegal operators that were actively accessible to Dutch consumers at the time. These operators were internationally available, meaning they accepted consumers from any jurisdiction. The findings of this research highlight the typical activities of unregulated casinos, which also pose a significant threat to the Finnish market. As follows:

- **Lack of identity verification and accessibility to minors**
One of the most alarming findings is the ease with which minors can register and gamble on these platforms. Many of the examined operators do not require identity verification upon registration. This allows minors to create accounts, deposit funds, and place bets without restriction. Cryptocurrencies further facilitate anonymous transactions, making age verification even more difficult to enforce.
- **Absence of responsible gambling measures**
The research found that most unregulated casinos do not implement responsible gambling policies. There are no self-exclusion options, deposit limits, or tools to prevent gambling addiction. In contrast, regulated markets enforce strict policies to protect consumers from gambling-related harm.
- **Unclear and unfair withdrawal policies**
Another significant issue is the enforcement of arbitrary withdrawal limits. Many of the examined casinos limit withdrawals to small weekly or monthly amounts, forcing players to keep their winnings on the platform. This practice encourages continued gambling rather than responsible cash-out options. Furthermore, some operators have policies that allow them to indefinitely delay or even deny withdrawals.
- **Potential for money laundering and fraud**
Many of these illegal casinos accept cryptocurrency payments and other anonymous payment methods, such as e-vouchers. This raises concerns about money laundering, tax evasion, and other financial crimes. In a regulated market, financial transactions are monitored, and operators must comply with anti-money laundering (AML) laws.
- **Lack of consumer protection and legal recourse**
Because these operators are not licensed in the Netherlands, players who experience issues—such as non-payment of winnings—have no legal recourse. Regulated platforms must adhere to consumer protection laws and are subject to oversight by national gambling authorities, ensuring that players' rights are upheld.

¹³ <https://kva.nl/onderzoek-kva-naar-risicos-illegaal-online-kansspelaanbod-oktober-2023/>, 20-1-2025.

- **Targeting Dutch consumers despite operating illegally**

The research found that these casinos specifically target Dutch players by offering Dutch-language support, Dutch payment methods such as iDEAL, and advertising through illegal affiliate networks. This demonstrates the difficulty of eliminating unregulated gambling sites entirely without a strong legal framework and enforcement mechanisms.

The Dutch case highlights the dangers of an unregulated gambling market. Without legal affiliation to guide players toward licensed operators, consumers—especially minors—are at significant risk. The absence of responsible gambling measures, lack of consumer protection, and potential for financial crimes further emphasize the importance of a well-regulated market with responsible affiliate marketing. If Finland moves forward with a ban on affiliate marketing, the black market could flourish, as seen in the Netherlands, making it more difficult to protect consumers from harm.

2.2. Promotion of unregulated casino's (SEO and Google Ads)

Illegal gambling operators increasingly rely on illicit affiliate networks to reach players, a trend that has been widely observed in regulated markets, including the Netherlands. This method allows these operators to bypass regulatory controls while gaining direct access to consumers.

One of the primary strategies used by illegal affiliates is search engine optimization (SEO). By targeting high-value keywords relevant to consumers in specific jurisdictions, these entities secure prominent positions in search results, effectively directing traffic toward unlicensed gambling platforms. In addition to SEO, illegal affiliates have demonstrated an alarming ability to circumvent Google's advertising policies, successfully creating and maintaining Google Ads accounts despite the platform's restrictions.

A recent case study in the Netherlands,¹⁴ where advertising activity was monitored in February 2024, revealed that illegal affiliates spent at least **\$1.637.007** on Google Ads in just one month. Extrapolated annually, this translates to an estimated **\$20.000.000** in illicit advertising expenditure within the country—an amount that excludes their extensive SEO-driven initiatives.

This pattern is not unique to the Netherlands; similar tactics have been observed in multiple regulated markets. Finland, in particular, faces a significant risk of experiencing the same phenomenon. In the absence of legal alternatives, Finnish search results for gambling-related queries would likely be dominated by illegal affiliates. For instance, if a Finnish consumer searches for (the Finnish equivalent of) "Online Gambling Finland," the top search results may exclusively feature unlicensed and unregulated operators, exposing consumers to potentially harmful platforms.

2.3. Focus on vulnerable players

From our experiences in the Dutch market, we have noticed that illegal affiliates (and, by extension, illegal gambling operators) focus on vulnerable individuals. We have a clear example of this:

¹⁴ Conducted by KVA, we will share the relevant spreadsheet if requested.

In the Netherlands, there is a centralized tool for exclusion from all forms of gambling, both offline and online. This system is called the ‘Centraal Register Uitsluiting Kansspelen’ (translated: Central Register for Gambling Exclusion), commonly abbreviated as ‘Cruks.’¹⁵ Within Cruks, individuals can opt for a complete gambling ban for a minimum of six months. Since Cruks went live on October 1, 2021 (coinciding with the introduction of Dutch online gambling regulations), a total of 89.418 individuals have registered in the system.

It is reasonable to assume that individuals who register with Cruks are dissatisfied with their own gambling behavior. They may be gambling excessively, experiencing financial losses they cannot afford, or suffering from a gambling addiction. In the Netherlands, Cruks registrants are by definition classified as ‘vulnerable individuals.’ Article 2.5 of the Dutch Responsible Gambling Policy Rules¹⁶ also strictly prohibits any form of advertising targeted at these vulnerable individuals.

It is also understandable that someone registered with Cruks might still feel the urge to gamble. A logical next step would be to search for the term ‘**Casino without Cruks**’ on Google.¹⁷

In recent years, KVA has conducted research into the presence of illegal affiliates using SEO techniques on Google to target individuals in the Netherlands searching for ‘Casino without Cruks.’ In October 2023, KVA published a study revealing that illegal affiliates focusing on ‘Casino without Cruks’ received at least **84.720** unique visitors from the Netherlands.¹⁸ In September 2024, a similar study was published, showing that traffic to ‘Casino without Cruks’ affiliates had increased to **274.843**.¹⁹

On October 1, 2024, net monthly deposit limits came into effect for Dutch online gambling operators, with €700 being set as the standard monthly guideline.²⁰ Almost immediately after these regulations took effect, it became apparent that illegal affiliates had begun creating ‘**Casino without limit**’ pages. Naturally, players who do not want to be restricted by a deposit limit will search for ways to gamble without limitations via search engines. It is also important to note that excessive participants in online gambling are often classified as vulnerable individuals.

Since October 1, 2024, the KVA has been monitoring the unique Dutch monthly search traffic directed toward illegal affiliates focusing on ‘Casino without limit.’ The data revealed that both search volume and the number of domains more than doubled within just four months:²¹

¹⁵ <https://cruksregister.nl/>, 18-2-2025.

¹⁶ <https://zoek.officielebekendmakingen.nl/stcrt-2024-18177.html>, 18-2-2025.

¹⁷ ‘Casino zonder Cruks’, in Dutch.

¹⁸ <https://kva.nl/onderzoek-door-het-keurmerk-verantwoorde-affiliates-kva-inzake-zoekvolume-illegaal-aanbod-kansspelen-op-afstand/>, 18-2-2025.

¹⁹ <https://kva.nl/kva-rapportage-zoekvolumes-casino-zonder-cruks-2024/>, 18-2-2025.

²⁰ Article 3.1.12. of the Dutch Responsible Gambling Policy Rules, <https://zoek.officielebekendmakingen.nl/stcrt-2024-18177.html>, 18-2-2025.

²¹ <https://kva.nl/kva-onderzoeksrapport-zoekvolume-casino-zonder-limiet-kwetsbare-groepen-kva-2024-2025/>, 18-2-2025.

Month	October 2024	November 2024	December 2024	January 2025	February 2025
Domains (non-exhaustive)	19	22	27	32	41
Unique Monthly Search Traffic	172.576	294.255	313.849	385.093	412.997

It is therefore clear that illegal affiliates, and by extension, the illegal online gambling operators they collaborate with, deliberately focus on vulnerable individuals (players). While in the case of 'Casino without Cruks' and 'Casino without limit' in the Netherlands, this targeting is intentional, the following is particularly concerning:

The research discussed in Chapter 2.1 of this report already revealed that, due to anonymous registration processes and the ability to deposit using cryptocurrency, illegal online gambling operators are effectively accessible to minors.

On November 8, 2023, KVA published an additional report with examples of ways to make anonymous deposits using cryptocurrency. It also explained how minors can anonymously gain access to crypto wallets.²²

On May 23, 2024, KVA announced research findings showing that minors with Dutch youth bank accounts (in this case, from Rabobank) could easily make deposits and subsequently gamble at illegal online gambling operators.²³ This research was featured in the national newspaper *de Volkskrant*,²⁴ after which official questions were raised in the Dutch Parliament to the government (the Cabinet) regarding the findings of this study.²⁵

61. Klopt het dat uit onderzoek van het Keurmerk Verantwoorde Affiliates (KVA) blijkt dat minderjarigen in Nederland zeer eenvoudig online kunnen gokken bij illegale aanbieders? Welke acties onderneemt het kabinet hier momenteel op?

Translation: "Is it correct that research by the Keurmerk Verantwoorde Affiliates (KVA) shows that minors in the Netherlands can very easily gamble online with illegal providers? What actions is the Cabinet currently taking in response to this?"

²² <https://kva.nl/aanvullend-rapport-op-kva-onderzoek-riscos-illegaal-aanbod-anoniem-registreren-en-cryptovaluta-storten/>, 18-2-2025.

²³ <https://vnlok.nl/onderzoek-illegale-aanbieders-laten-minderjarigen-zonder-beperkingen-gokken>, 18-2-2025.

²⁴ <https://www.volkskrant.nl/binnenland/minderjarigen-kunnen-onbeperkt-en-onbeschermd-gokken-via-illegale-aanbieders-juist-deze-groep-loopt-risico-op-verslaving~bef4de56/>, 18-2-2025.

²⁵ <https://www.tweedekamer.nl/kamerstukken/detail?id=2024Z12750&did=2024D37099>, 18-2-2025, published on CasinoNieuws.nl as follows: <https://www.casinonieuws.nl/politiek/vragen-aan-kabinet-na-onderzoek-over-gokken-door-minderjarigen/>, 18-2-2025.

In November 2024, KVA published follow-up results, which showed that it was still possible for minors to deposit money using a youth bank account at illegal online gambling operators.²⁶

The Netherlands is facing a persistent presence of illegal online gambling operators and illegal affiliates. On February 14, 2025, the Dutch Gambling Authority published a report revealing that the illegal gambling market had even surpassed the legal gambling market in the Netherlands.²⁷ Illegal affiliates and illegal online gambling operators operate without restraint. They explicitly focus on recruiting vulnerable individuals (potential gambling addicts), and there is an opportunity for minors to gamble. It is worth noting—and even warning—that Finland may face the same issue.

2.4. Using regulated affiliation to push unregulated away

In SEO affiliation, the focus is on websites that are discoverable in the organic search results of Google (or similar search engines). When a consumer actively searches for gambling offers, for example by entering “Online Casino” in a search engine, various affiliate websites appear that showcase casino reviews and comparisons. In legal affiliation, these sites only refer to online gambling websites operated by companies holding a license in the respective country. In illegal affiliation, however, the same search terms yield an overview of gambling websites without a license, which are still accessible to consumers in that country.

Where the presence of legal affiliate websites pushes illegal affiliate websites out of the search results, the absence of legal affiliates results in only illegal options appearing. Thus, banning legal affiliation directly creates a dangerous situation for consumers.

In addition to the practical benefits of legal affiliate websites, legal affiliates can specifically help counter the harmful practices of illegal affiliates and illegal gambling companies. As explained earlier in this report regarding the “Casino zonder Cruks” and “Casino zonder limiet” search term focus of illegal affiliate websites, the KVA in the Netherlands has launched initiatives to combat these practices. The KVA has requested that its members also create “Casino zonder Cruks”²⁸ and “Casino zonder Limiet”²⁹ pages; however, instead of filling these pages with overviews of gambling offers, they have been populated with warnings and referrals to support services. With this initiative, individuals who have self-excluded from gambling but still feel the urge to gamble might reconsider at the last moment.

Similar initiatives could also be launched by QMRA in collaboration with legal Finnish affiliate websites (members of QMRA). In this case, an analysis would be conducted to determine which search terms in Finland might be problematic—consider, for instance, the Finnish equivalent of the search term “Casino without Finnish license.”

²⁶ <https://kva.nl/kva-rapportage-storten-bij-illegale-online-casinos-blijft-mogelijk-met-nederlandse-jongerenrekening-november-2024/>, 18-2-2025.

²⁷ <https://kansspelautoriteit.nl/nieuws/2025/februari/positief-effect-nieuwe-regels/>, <https://www.casinonieuws.nl/online/kansspelautoriteit-kanalisatie-bsr-onder-50-procent/>, 18-2-2025.

²⁸ <https://www.casinonieuws.nl/online/kva-roept-leden-op-casino-zonder-cruks-pagina-in-te-richten/>, 23-2-2025.

²⁹ <https://www.casinonieuws.nl/online/kva-roept-leden-op-casino-zonder-limiet-pagina-te-maken/>, 23-2-2025.

2.5. Conclusion on the importance on regulated SEO affiliate marketing

In conclusion, regulated SEO affiliate marketing is crucial for directing consumers to licensed, responsible gambling operators. Data from the Netherlands shows that legal affiliates can counter the influence of unregulated platforms, mitigating risks such as underage gambling, targeting vulnerable players, and fraudulent activities. This approach offers a viable model for Finland to curb unregulated operators and enhance market integrity, thereby protecting consumers and strengthening market stability.

3. Position of (KVA) affiliates in the Netherlands

In the Netherlands, the efforts of legal affiliates have not gone unnoticed. The "Casino zonder Cruks" initiative by KVA was closely followed by the Dutch Gambling Authority (Kansspelautoriteit, Ksa), which also decided to create a dedicated "Casino zonder Cruks" page.³⁰

In an interview with the Dutch website CasinoNieuws.nl, the chairman of the Dutch Gambling Authority stated the following:³¹

"It is good that affiliates exist. As I mentioned before, for a well-functioning regulated market, the legal offering must be findable. Affiliates play an important role in this. We have also previously indicated that we view the various initiatives undertaken by KVA in many cases as positive, such as the fight against illegal casinos that actively advertise ways to bypass Cruks."

The formal evaluation of Dutch online gambling legislation, published on November 5, 2024, also included a positive remark regarding the initiative of legal KVA affiliates:³²

"To ensure that people searching for a term like 'Casino zonder Cruks' are not directed to illegal casinos, the members of the Keurmerk Verantwoorde Affiliates and the Ksa itself have created dedicated pages focused on the search term 'Casino zonder Cruks'."

Furthermore, the Dutch State Secretary responsible for the gambling portfolio published his vision on gambling policy (February 14, 2025),³³ in which new legislation was also announced. Regarding online gambling advertising, the following was stated:

*"The introduction of a total ban on online gambling advertising, **with an exemption clause for limited advertising in an environment where people are specifically searching for gambling opportunities, in order to distinguish the legal offering from the illegal offering.**"*

³⁰ <https://www.casinonieuws.nl/online/kansspelautoriteit-casino-zonder-cruks/>, 28-2-2025.

³¹ <https://www.casinonieuws.nl/interviews/michel-groothuizen-interview-voorzitter-kansspelautoriteit-ksa/>, 28-2-2025.

³² <https://www.rijksoverheid.nl/documenten/rapporten/2024/11/05/tk-bijlage-1-rapport-evaluatie-van-de-wet-koa>, 28-2-2025

³³ <https://www.rijksoverheid.nl/documenten/rapporten/2025/02/14/tk-bijlage-1-overzicht-wijzigingsvoorstellen>, 28-2-2025.

In the Netherlands, the importance of targeted (SEO) affiliation is recognized. It is viewed as a method to keep individuals, who are actively searching for online gambling, within the legal options. The Netherlands is not the only country that considers legal affiliation in this way. Belgium also has an exemption to the advertising ban for affiliates, based on an exception in its applicable Royal Decree.³⁴

The indication that affiliation is viewed positively at both a regulatory and enforcement level in comparable markets could be a strong reason for Finland to conduct further research and reconsider its stance on this matter.

4. The risk of banning affiliate marketing in the Finnish regulated market

This report explains the risks of a ban on legal affiliation. If legal affiliates are prohibited, organic search results for any gambling-related query will be dominated by illegal offerings. The situation in the Netherlands has shown that the illegal online gambling sector is ruthless. Vulnerable individuals (including potential addicts and minors) are accepted on illegal websites and, in many cases, are even actively targeted.

The risk of banning legal SEO affiliates in Finland is significant. Legal affiliates, simply by their presence, can contribute to channeling users towards the legal offering.

5. QMRA for Finnish affiliates

This report provides an explanation of the initiatives of the Dutch equivalent of QMRA, called KVA. QMRA intends to launch a certification for Finnish affiliates, ensuring they are subject to strict controls and legal compliance. Additionally, QMRA is prepared to conduct research—potentially in consultation with Finnish authorities—into search terms similar to "Casino zonder Cruks" in the Netherlands, as well as other search terms that may attract high traffic from vulnerable individuals.

With insights into these practices, QMRA, together with its members, will undertake initiatives to counteract illegal operators.

³⁴ <https://gamingcommission.be/nl/operatoren/kb-reclame>, under 'Affiliate-websites', 28-2-2025.