The Swedish Consumer Agency's Code of Statutes

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The Swedish Consumer Agency's general advice on the marketing of games to consumers;

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adopted on 23 June 2025.[1]

The Swedish Consumer Agency has adopted the following general advice. This advice relates to the provisions on marketing laid down in the Gambling Act (2018:1138) and to the Marketing Act (2008:486).

Section 1. Introductory provisions

1.1. Introduction

General advice constitutes recommendations on the application of legislation and indicates how someone may or should act in a certain respect. General advice aims to simplify interpretation and promote uniform application, but is not formally binding.

The general advice is accompanied by an explanatory document which includes, among other things, comments on the general advice.

1.2. Application

This general advice applies for the application of the rules on the marketing of games to consumers in the Gambling Act (2018:1138), hereinafter referred to as the Gambling Act.

The advice applies to games provided in Sweden, regardless of whether the game is provided from another country.

Online games not directed to the Swedish market shall not be deemed to be provided in Sweden.

The advice does not apply to providers of intermediary services as defined in Article 3(g) of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for

[1] See Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations.

Digital Services and amending Directive 2000/31/EC (Digital Services Regulation).

1.3. Definitions and concepts

Games means lotteries, betting, combination schemes and pyramid schemes.

Online games means games that are provided through the use of electronic means of communication and played by a player or multiple players and the party that provides the game.

Bonus means a discount or similar financial incentive that is directly linked to the game.

Marketing means advertising and other measures in the course of business activities, which are intended to promote the sale of and access to products, including a trader's actions, omissions or other measures or behaviour before, during or after sale or delivery of products to consumers or traders.

Commercial communication means for the purpose of this advice, any form of commercial communication intended to promote, directly or indirectly, games provided by a licensee.

Section 2. The requirement of moderate marketing

2.1 Marketing of games shall be moderate

Under Chapter 15, Section 1 of the Gambling Act, moderation must be observed when marketing games to consumers.

General advice
In order to determine whether a marketing measure is compatible with the moderation requirement, an overall assessment needs to be made.

The requirement for moderation applies to all marketing of games falling within the scope of Section 1.2 and covers the presentation itself, the content of the marketing, and the way in which the marketing has been designed for the chosen medium.

The marketing of games in places where consumers usually do not expect such marketing or where such marketing should not take place can be seen as not moderate in itself, see in particular Sections 2.3 and 2.4.

2.2 Marketing design

2.2.1 Marketing that is intrusive and liable to attract particular attention

General advice
The marketing of games must not be intrusive or intended to attract particular attention. Marketing that attracts particular attention by its design should not be permitted.

2.2.1.1 In particular, on the chances of winning

General advice
The marketing of games shall not be designed in such a way as to give the impression that the chances of winning are greater than they actually are. Examples of such marketing may be claims that give the consumer the impression that it is easy to win large sums of money, or claims that it is possible to win quickly.

Marketing should not be designed or presented in such a way as to give the impression that the consumer is guaranteed to win, or that it is in principle impossible not to win.

2.2.1.2 In particular, on technical and graphic designs

General advice
Technical designs that the consumer cannot reasonably avoid are considered intrusive and not compatible with the requirement of moderation. Examples of such technical designs may be pop-ups and advertisements that take over the entire screen or may otherwise be considered intrusive.

Technical designs containing, for example, pulsating and/or flashing elements and that attract particular attention may be considered intrusive and not compatible with the moderation requirement.

2.2.1.3 In particular, on the participation of well-known persons in the marketing of games

General advice
When well-known and successful individuals are featured in the marketing of games, the marketing should not be designed in such a way as to give the impression that gambling has contributed to the success or fame of the person. Neither should the marketing give the impression that gambling can lead to such success or fame for other players.

2.2.2 Inciting marketing

General advice
Marketing of games should not contain inciting messages that may encourage or influence the consumer to make an unpremeditated decision to start playing.

Marketing that, regardless of its content, as a result of its location, presentation or other specific design, can be regarded as inciting gambling and should not be regarded as compatible with the requirement for moderation.

2.2.2.1 Accurate and balanced marketing

General advice
The marketing of games should be objective and balanced in terms of design and content. Marketing should not be designed in a way that makes the game appear risk-free.

Marketing should not include claims that no effort is required to play when a counter-performance by the consumer is required, for example that the consumer must pay a contribution in order to participate in the game.

Marketing should not convey the impression that gambling can be the solution to social or economic problems. Examples of such marketing may be statements suggesting that gambling is an alternative to employment, income, or a solution to social problems such as loneliness or boredom.

2.3 Ban on marketing specifically aimed at children and young people

Under Chapter 15, Section 1, point 2 of the Gambling Act, it is prohibited to specifically target the marketing of games to persons under the age of 18.

General advice
The prohibition should cover, on the one hand, marketing that is intentionally or explicitly directly aimed at children and adolescents and, on the other hand, marketing which, by its design, makes it likely that children and adolescents pay particular attention to it and may be affected by the marketing.

In order to determine whether marketing can be considered to be specifically aimed at children and young people, an overall assessment needs to be carried out. Symbols and phenomena that can reasonably be associated with or be particularly appealing to children and adolescents should be avoided. The choice of marketing channel, characters, colours,

images, layout and music may be factors that can be taken into account during the assessment.

Marketing should not be presented in such a way as to exploit the inexperience and lack of knowledge of children and young people. Marketing should also not be presented in such a way as to convey the impression that gambling is a proof of adulthood.

2.3.1 Specific information on marketing in places intended for children and young people

General advice
Marketing of games in places, both digital and physical, that are primarily intended for children and young people is not allowed. Examples of digital spaces include online forums, social media accounts and groups, podcasts and TV programmes.

See also Section 2.4, point 2 on outdoor advertising in places specifically intended for children and young people.

2.3.2 Advertising that depicts children and young people

General advice
Images of children and young people in connection with the marketing of games should only appear if the purpose of the images is to describe the non-profit purpose to which the activity contributes and that the marketing otherwise meets the moderation requirement.

2.3.2 Sponsorship and products intended for children and young people

Chapter 15, Section 5 of the Gambling Act stipulates that, in the case of sponsorship agreements, the licensee shall ensure that its logos and the names of gambling products or gambling services are not to be found on products that are intended to be used by persons under 18 years of age.

General advice
Licensees' logos and names of gaming products or services should not appear in contexts and gatherings specifically aimed at children and young people.

2.4 In particular, on outdoor advertising

General advice
Outdoor advertising of games is generally permitted, provided that it meets the moderation requirement. In order to determine whether the outdoor advertising is compatible with the moderation requirement, an overall assessment needs to be carried out.

Outdoor advertising of games must not take place in places specifically intended for children and adolescents. See also Section 2.3 on the prohibition of marketing specifically intended for children and adolescents.

Section 3. Direct advertising

3.1 Prohibition of direct advertising to excluded players

Under Chapter 15, Section 2 of the Gambling Act, marketing may not be aimed directly at consumers who have opted for self-exclusion from gambling. If a consumer has closed their player account with a licensee, then the licensee may only address marketing directly to the consumer if the consumer actively approved this in connection with the account closure.

General advice
The prohibition should cover all types of direct advertising and apply regardless of whether the consumer has excluded himself from gambling in the self-exclusion register or directly with the licensee.

Section 4. Obligation to provide information

Under Chapter 15, Section 3 of the Gambling Act, commercial communications for games must contain clear information on the minimum age for playing.

At venues where gambling takes place, and in the context of commercial communications concerning gambling — with the exception of such communications via radio — licensees shall ensure that contact information is also given for an organisation that provides information on, and support for, problem gambling.

4.1 Clear information requirements

General advice
In the context of commercial communications for games, the licensee shall ensure that information on the age limit for the game and the contact details of the supporting organisation are presented in a manner that is clear to the consumer.

Information on the age limit and contact details of the supporting organisation shall be clearly indicated in the commercial communication. The information should be easy to read and should not be placed in such a

way that it risks blending into the background, be written in difficult-to-read or small text, or be presented in any other way that makes it difficult for the consumer to read.

4.1.1 In particular, the contact details of the support organisation

General advice
In order to comply with the information requirement, it should not be considered sufficient to simply indicate the name of the supporting organisation. Some form of additional contact information, such as web address, e-mail address or telephone number, should also be provided.

Section 5. Bonus offers

In addition to the specific advice in this Section, Sections 2, 3 and 4 also apply to the marketing of bonus offers.

The bonus term is defined in Section 1.3 and follows the definition of the Gambling Act.

General advice
In order to determine whether an offer constitutes a bonus offer within the meaning of the Gambling Act, an overall assessment must be made. An offer may be regarded as a bonus offer even if the term ‘bonus’ is not expressly mentioned in the marketing.

5.1 Terms and conditions for all bonus offers

According to Chapter 11, Section 6 of the Gambling Ordinance (2018:1475), a licensee offering a bonus must in a clear and comprehensible manner, at the time the offer is made and when the offer is used by the player, inform the player of the terms and conditions applicable to the offer.

5.1.1 Placement and presentation of all terms and conditions for bonus offers

General advice
When marketing bonus offers, the terms and conditions of the offer should be presented clearly and distinctly, and kept separate from other terms and conditions. If a bonus offer is advertised on the internet, all terms and conditions of the offer should be available no more than one click away from the advertisement. A link to the licensee’s homepage should not be considered sufficient.

5.1.2 Prior to the use of bonus offers

General advice
In addition to what is stated in 5.1.1, the licensee must also, when the consumer is about to take advantage of the bonus offer, clearly set out the terms and conditions of the offer.

The bonus offer should not be designed in such a way that the consumer is tempted to accept it without first having read the terms and conditions. For example, there should not be features that allow the consumer to accept the offer directly.

5.2 Particularly important terms and conditions for bonus offers

General advice
Conditions on turnover requirements, intervention requirements and time limits should be considered particularly important for the consumer. The condition that only new players may receive the offer, where applicable, should also be considered particularly important for the consumer.

5.2.1 Location and presentation of particularly important conditions for bonus offers

General advice
The particularly important terms and conditions should be clearly presented already in the initial advertisement where the bonus offer is marketed. The terms and conditions should not be placed or presented in such a way as to make it difficult for the consumer to view them, for example in hidden tabs.

Section 6. In particular, on registration

Under Chapter 12, Section 1 of the Gambling Act, a licensee must register anyone who wishes to participate in gaming. Under Chapter 13, Section 1 of the same Act, a licensee with a licence for online gambling must open a gambling account for each registered player.

6.1 Marketing in connection with the registration process

General advice
Marketing that contains persuasive and tempting messages on continuing a registration that the consumer has chosen to cancel should not be considered compatible with the moderation requirement.

6.2 Claims that no registration is required

General advice
Licensees who are subject to the registration requirement may not use claims in their marketing that can give the consumer the impression that no registration or player account is needed to play.

This general advice will enter into force on 1 September 2025.

CECILIA TISELL