

Name of the brand / Horganization:

Heart Bingo

Email:

sarah.caskie@betvictor.com

https://www.heartbingo.co.uk/

LOGIN DETAILS FOR THE JUDGES.

Some of the judging panel may not have an account at your website. It will benefit your submission if you can provide a temporary username and password for the judges to use and access your website.:

Username: 11632348 Password: Wh!chB!ng0

DEPOSIT LIMITS & OPTIONS FOR PLAYERS TO CONTROL SPENDING.

What are your default deposit limits for new players and what options are available to players to set their own limits. If a player wishes to self-exclude, how easy is it for them to do so and what are their options? What systems do you have to ensure that self-exclusion is fully honoured? :

When a player first registers, they are automatically provided with a pop-up to set a deposit limit. They're able to amend the limit immediately but will need to wait 24 hours for any increases to be applied and they will need to return to the site and confirm this. We default to a daily deposit limit, but the player is prompted to select the value from a dropdown.

The player can select a Daily, Weekly, Monthly, or No Limit for their deposit limit to proceed to the site. The values start from £5 and it is easy for the player to select which option they would like.

This feature is not just available upon registration but available via our Safer Gambling Portal, which is accessible from the left-hand navigation, as well as under the Account section of a customer's Heart Bingo account. This means the deposit limit feature is always readily accessible should a customer wish to set this at any time during their play with Heart Bingo.

In addition to deposit limits and Self-Exclusion, within our Safer Gambling portal we have other ways to help customers stay in control of their play and ensure that their time on site is enjoyable but also responsible.

We have

Time Alerts, whereby customers can set reminders that pop up at set intervals; Time Out sessions, which customers can set for anything from 24 hours to 6 weeks; and a Problem Check-List that customers can run through, which lays out warning signs of problem behaviour.

Also, the time is always predominantly displayed on site, so that customers can keep



track of the time they have spent on site.

All our Safer Gambling tools are easily accessible to the customer to set up by themselves without needing to speak to an agent and are applied immediately once set. We also regularly survey our customers around their gameplay to ensure that they are comfortable with their level of spend and activity on site.

Players can self-exclude from their account via the Safer Gambling Portal which, as mentioned above, is clearly signposted on site. They can choose to exclude from 6 months to 1, 2 or 5 years. They need to then confirm their choice and the Self-Exclusion is instantly applied. They can also contact us via live chat or email to put the Self-Exclusion in place.

This Self-Exclusion then extends to every brand within the BetVictor group, so any new accounts opened with either BetVictor, Parimatch, talkSPORT BET or Heart Bingo are automatically closed upon registration if a Self-Exclusion has been applied on any of the brands within the group.

Our account management software contains sophisticated duplicate account monitoring systems that allow us to quickly identify any self-excluded customers that may open new accounts.

Furthermore, we have real-time alerts reviewed by our Safer Gambling team, where the system may suspect a duplicate account by looking at several customer touchpoints that contain some resemblance but are not an exact match to an existing account, so the team can manually review these accounts.

Finally, we run reports for accounts where the details are more distantly associated but could still potentially have links to the excluded customer, which are also reviewed by our Safer Gambling team. While customers are excluded, we have an established reporting system that will alert us if an account is re-opened prior to the end date of a Self-Exclusion. This also applies to accounts that are re-opened before the required 24 hours of the Self Exclusion re-open procedure has passed.

Finally, we have a comprehensive Control Monitoring process that dip-samples different accounts to ensure that all exclusions are executed as expected, and re-open processes are followed completely. Customers will receive an email to confirm their Self-Exclusion is in place and they are automatically removed from our in-house CRM system, so they will no longer receive further correspondence about the brand. We also encourage the customer to uninstall our app from their phone.

In addition, within the Self-Exclusion confirmation email we also advise them of organisations that can help assist them with problem gambling in addition to 'blockers' that they can install on their devices to prevent them from accessing any gambling content. We also upload a list of self-excluded customers to social media platforms to prevent these customers from seeing any Heart Bingo ads.



Furthermore, our Self-Exclusion process is also extended to our partners, so on the occasions where we send emails to a partner or affiliate's CRM database, we also provide the partner with an encrypted database of our self-excluded customers to ensure these customers do not receive any communications about Heart Bingo via our partners.

ADVERTISING & COMMUNICATIONS.

Please provide any evidence of social responsibility / responsible gambling messaging in your advertising and player communications, e.g. emails / social media / on-site messages. How prominent are your calls to 'play responsibly'? How clear are your terms & amp; conditions, specifically on offers designed to attract new players? Give details of how you ensure no marketing communications are sent to self-excluded customers by you or your affiliates.:

Our advertising always includes two responsible gambling messages and always references begambleaware.org to signpost both new and existing customers where to seek help should they need it.

We have carried out a risk assessment on our brand ambassador Olly Murs and decided that as there is some appeal to children with him, he has been removed from all our brand advertising to prevent him being seen or heard promoting Heart Bingo by anyone under the age of 18. Images of him only appear on our site after customers have logged-in to Heart Bingo or within our CRM communications and he doesn't appear in any acquisition advertising, whether that is his image or voice on radio ads. This way we can ensure that only customers who we have verified as being over 18 see his image in reference to the brand.

We take similar steps to ensure that any banners or casino game tiles that may appeal to children can only be viewed by logged-in users. We schedule all our radio ads so that they are not aired during times of the day when the percentage of under 18s listening is greater than 25% so no ads air during breakfast or drive times. No voiceovers or sound effects are used in the ads where the voice sounds young or would appeal to children.

We have taken an extra step and do not use Olly Murs' voice in these ads to ensure that there is no appeal to a younger demographic. Similarly, we do not use his image on OOH ads and these ads are not shown anywhere near a place of worship or a school. As an alternative to Olly Murs, we use models who are all over 25 and we do not have them pose in such a way or wear the sort of clothing that would emulate youth culture.

We have age-gated all our social media channels, so that anyone engaging with our pages needs to confirm they are 18+. We prominently display a link to our Safer Gambling pages on our social media channels and we have both a logged-out Safer Gambling site for Heart Bingo as well as a logged-in portal so that customers can always access help when interacting with our brand. We also ensure that images used on social media do not appeal to children, we refrain from using cartoon images or emojis on our posts.



We also have age-gated the Heart Bingo blog and are equally mindful of the content we post there. Additionally, we have weekly dedicated Safer Gambling posts on all our social media channels to ensure our customers are reminded of the tools available to help them stay in control of their gambling to make their experience at Heart Bingo an enjoyable one.

For paid social or boosted posts we restrict to a 25+ age group as an extra precaution to prevent ads being viewed by underage consumers. Furthermore, on any paid or boosted ads we upload a list of self-excluded customers so that customers who have informed us that they have problems with gambling are not served a Heart Bingo ad.

Additionally, our Self-Exclusion process is also extended to our partners, so on the occasions where we send emails to a partner or affiliate's CRM database, we also provide the partner with an encrypted list of our self-excluded customers' email addresses, which are then removed from our partners' lists to ensure these customers do not receive any communications about Heart Bingo via our partners. Within our affiliate terms there is a requirement for affiliates to post responsible gambling messages on their site and social media channels. We also use third party software which crawls the internet for uncompliant terms to ensure that Heart Bingo has not been promoted in an irresponsible way by our affiliates. In addition to this, Affiliate Managers carry out weekly manual checks to ensure that Heart Bingo is promoted in a responsible way by our partners.

Our Compliance team also do their own regular checks of our affiliates, in addition to reviews of our onsite, socials, blog and email communications to ensure on-going compliance and responsible marketing of our brand. Identified breaches from affiliates are subjected to a grading system according to severity, however if any breach isn't remedied within a 48-hour period, commissions are withheld, and affiliate accounts closed. For the most severe breaches, accounts are closed immediately.

We also send a list of negative keywords to our affiliate partners to ensure they do not bid on these terms on Google, in addition to ensuring our own PPC team do not use these terms in their campaigns.

Each brand at BetVictor uses both an industry-wide list in addition to a brand-specific list to ensure further responsibility. When it comes to our offers and terms to attract new customers, we always ensure that promotions are clear, easy to follow and refrain from tying customer funds up in promotions, as we have no wagering requirements on all our offers.

Our acquisition offers are simple 'spend and get' mechanics with a low spend requirement, most are set at a maximum of £10. We also offer a completely no strings attached £5 no deposit offer for customers signing up directly to Heart Bingo. This is the offer we promote in our radio ads and on other non-traditional gaming channels to ensure that it is very simple for a customer to understand and redeem especially if they are new to gambling.



All offers have the significant terms of the promotion clearly displayed on the banner image and landing page, in addition to extremely straight-forward terms and conditions, which are regularly reviewed by our Compliance and Legal teams to ensure that they are not misleading in any way.

All marketing materials are approved by both our Compliance team and the Head of Heart Bingo before they are published. This two-step process ensures that there can be no misinterpretation or subjectivity when reading terms and conditions. All our email marketing to customers always includes a Safer Gambling message within the disclaimer, as well as prominent links to our Safer Gambling tools in the footer, as can be seen in the attached example.

Also, within our welcome email (which is the first email customers receive) we highlight the Safer Gambling tools available on our site within the email itself. We have a variety of Safer Gambling flags in place which monitor customers deposits, turnover, time on site, etc, and a mask is applied dependent on the flag that is hit. We then tailor the CRM comms based upon the relevant mask that is hit and what actions the customer needs to take in order to remove the mask.

For example, when the 'Pending Interaction' mask is applied, it will involve speaking to a member of our Safer Gambling team on the phone – the mask will not be lifted and their account will remain blocked until they have spoken to a member of our SG team or 6 weeks has elapsed. After the 6 weeks, the mask will be downgraded but they will still need to fill out an online questionnaire in order to access their account, which will also have a monthly deposit limit set on it.

During last year's Safer Gambling week, we sent out dedicated communications to our whole database celebrating the range of tools we have available to our customers to help them remain in control of their gambling and ensure their time on site is an enjoyable one.

Our proprietary software has several fail-safes to prevent marketing communications being sent to excluded customers.

First, when an account is closed under a Self-Exclusion, they are automatically unticked from receiving marketing communications. This then instantly communicates with our marketing software to remove them from mailing lists, so there is no delay period between the two events.

Additionally, any account that is closed for any reason is removed from our marketing software, with a hardcoded restriction that marketing cannot be sent. We operate reports that are monitored by our Safer Gambling team in case either of these technical actions fail so that they can be manually applied as soon as possible to enable a greater level of safe-guarding. We are often able to achieve this removal within 15 minutes of the closure, much quicker than the required 48 hours.



Furthermore, we also restrict marketing communications from being sent to players during a Time Out period, as we believe they should truly be able to disconnect during their breaks away from Heart Bingo. This process is outside of any regulatory requirement, as is our decision to extend a three-day marketing blackout for any customer immediately following an interaction with our Safer Gambling team to ensure we are not promoting to customers at a time when they might not be comfortable with their play on site.

RESPONSIBLE TICKET PRICES AND SETTINGS.

Is any consideration given to the pricing of tickets and / or other in-game settings to ensure that players have a fair chance to win and be able to play within their means? For example: What is the maximum number of tickets a player can purchase in a single game of bingo? What are your cheapest / most expensive ticket prices? Are players able to see clearly what they are spending?:

In our own exclusive room, Heart Bonanza Bingo, the maximum number of tickets available for any game is 50 - with a maximum stake of £5 and the minimum purchase is just one ticket at 1p.

Overall, the maximum number of tickets a player can purchase is 300 for a 1p game. There are other games with higher ticket prices and lower maximums to ensure that a customer spend doesn't escalate. In our private room, the maximum number of tickets for purchase is 50. This decreases as the prize value increases. In networked rooms the maximum number of tickets is 120.

The cheapest ticket price we run is 1p and the most expensive is 10p in our own rooms. The maximum price in a network room is 25p and 50p for headline networked games. Whilst players are playing, there is a profit/loss bar at the top of the screen and their balance is always clearly visible.

Players can only be 'in' one room at a time, with the option to switch between three rooms on their top navigation, making it much easier for customers to keep track of their spend and time spent on site. Alongside this, players can play only one mini game at the same time as a bingo game; again, to ensure that spending and time on site can be better controlled and monitored by our customers

PLAYER PROTECTION & PROBLEM GAMBLING ASSISTANCE.

What procedures, systems, tools and staff training exist to identify and protect potentially vulnerable customers? Are these procedures, systems and tools audited by a third party?:

We advise via pop-up on registration that we hold money in an Independent Trust Account to meet UKGC High Protection Requirements to ensure customers are reassured that their funds are safe. We have proprietary algorithmic real-time monitoring software to identify concerning player behaviour. Depending on the severity of the flagged behaviour, this triggers a pop-up player questionnaire or a complete stop on the



account until a call is had with a dedicated Safer Gambling agent, which will determine if the account should be unblocked.

We have proprietary account management software, which handles amongst other things duplicate accounts, Self-Exclusions, deposit limits, product blocks and Safer Gambling communications. This allows our team more time to speak to players who need it most. We have comprehensive Safer Gambling procedures that regularly evolve along with our technology. These include review, interaction and evaluation processes, ensuring we provide the best player protection with continuous improvement.

Checks are carried out every 10 minutes on customers' behaviour. We utilise an occupation and salary metric to evaluate all customers and compare their inputted data vs national databases and apply the most conservative salary value. We then enforce net deposit limits on every customer according to an algorithm from this data. We hold monthly review meetings to identify opportunities for improvement, with the Safer Gambling, Marketing and Compliance teams working closely together.

In addition to standard training for SG processes and procedures, our Safer Gambling and Customer Service staff are also trained in dealing with difficult conversations and on suicide prevention. Every employee undergoes Compliance and Responsible Gambling training and there is further training given to those in all Marketing, Safer Gambling, Customer Services and Due Diligence teams. Each department also has a Compliance Champion, who is nominated to undergo further Safer Gambling training to ensure that Safer Gambling and social responsibility are at the forefront of each team's dealings with every customer touchpoint.

Within Marketing, no communication is published or sent to a customer without sign-off by the Compliance Champion and the Compliance department. In the past, when customers have won large sums of money, we have put them in touch with financial advisors and recommended that they take a Time Out period or self-exclude from their accounts as a further measure of social responsibility and care. Social responsibility and responsible gambling training is also extended to our third parties, such as our SEO agency and the team at Global, to ensure that everyone is aware of the requirements and is always considerate of socially responsible promotion of the Heart Bingo brand.

As a UK-licenced operator, we are subjected to regular audits by various bodies, such as the Gambling Commission and GamCare, who thoroughly review all our practices to ensure we are operating in a responsible way. Outside of this, we employ a third-party agency to regularly audit our business as if they were the Gambling Commission to ensure that we are always at the top of our game when it comes to the responsible promotion of our products and processes, terms and conditions and that our promotions are fair and responsible.

FAIR WAGERING REQUIREMENTS & WITHDRAWAL PROCEDURES.

Are there any restrictions for players wishing to withdraw their winnings, such as minimum withdrawal amounts or wagering requirements on bonus money received? How often can a player make a withdrawal and how quickly are



withdrawals processed?:

Most of our bonuses are bingo tickets or free spins on slot games, neither of which have wagering requirements attached. Bonus funds from on-site promotions have no wagering requirements but may be marketed as 1x which is just the spend of their bonus funds. The minimum withdrawal amount is £5 for all our payment methods. Withdrawal processing times vary by method. For example, Debit Cards are 2-5 working days, Fast Funds within 30 minutes, BACS 1-3 working days. There is no limit to the number of withdrawals a customer can make within any time period.

Additional Information (optional):

We segment our database to ensure that our on-site promotions are tailored to a customer's gameplay, therefore a small staking customer would not receive a promotion with wagering amounts far greater than an amount they would traditionally spend within a certain time period to ensure we are not encouraging them to play beyond their means.

Likewise, our in-house CRM software is sophisticated enough that it would not send out a promotion to a customer which would lead the customer to exceed their deposit limit if they were to participate in that promotion. Additionally, our Safer Gambling team work 24/7 every day of the year to assist with any concerns.

https://webpals365-my.sharepoint.com/:f:/g/personal/elena_r_webpals_com/Ev4ur0pg8llte9DLO1-mo0B6HIMKMPr6G4E-vUdhPYwRw?e=jl9o6G