

Scrutinising video game and gambling advertising using social media ad repositories enabled by the EU Digital Services Act

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Concerns around gambling advertising

- ✦ **Exposure** to gambling advertising is linked to more **positive attitudes** about gambling and wanting to **participate more**.
- ✦ **Young people** (18–25 young men, in particular, who's known to be more vulnerable) are often shown many gambling adverts on **social media**.
- ✦ Under-18s might also be exposed to gambling advertising because Ofcom says **a third of children aged between 8 and 17** have false social media accounts **purporting to belong to someone aged 18 or above**. (Also video game loot box ads, which are not age-restricted...)

EU / EEA Digital Services Act (DSA)

Article 39

Additional online advertising transparency

1. Providers of very large online platforms or of very large online search engines that present advertisements on their online interfaces shall compile and make publicly available in a specific section of their online interface, through a searchable and reliable tool that allows multicriteria queries and through application programming interfaces, a repository containing the information referred to in paragraph 2, for the entire period during which they present an advertisement and until one year after the advertisement was presented for the last time on their online interfaces. They shall ensure that the repository does not contain any personal data of the recipients of the service to whom the advertisement was or could have been presented, and shall make reasonable efforts to ensure that the information is accurate and complete.
2. The repository shall include at least all of the following information:
 - (a) the content of the advertisement, including the name of the product, service or brand and the subject matter of the advertisement;
 - (b) the natural or legal person on whose behalf the advertisement is presented;
 - (c) the natural or legal person who paid for the advertisement, if that person is different from the person referred to in point (b);
 - (d) the period during which the advertisement was presented;
 - (e) whether the advertisement was intended to be presented specifically to one or more particular groups of recipients of the service and if so, the main parameters used for that purpose including where applicable the main parameters used to exclude one or more of such particular groups;
 - (f) the commercial communications published on the very large online platforms and identified pursuant to Article 26(2);
 - (g) the total number of recipients of the service reached and, where applicable, aggregate numbers broken down by Member State for the group or groups of recipients that the advertisement specifically targeted.
3. As regards paragraph 2, points (a), (b) and (c), where a provider of very large online platform or of very large online search engine has removed or disabled access to a specific advertisement based on alleged illegality or incompatibility with its terms and conditions, the repository shall not include the information referred to in those points. In such case, the repository shall include, for the specific advertisement concerned, the information referred to in Article 17(3), points (a) to (e), or Article 9(2), point (a)(i), as applicable.

The Commission may, after consultation of the Board, the relevant vetted researchers referred to in Article 40 and the public, issue guidelines on the structure, organisation and functionalities of the repositories referred to in this Article.



AFK Journey

Ads About

~170 results

Similar regional ads

AFK Journey
Video Game

View ads

劍與遠征：啟程 ✓
Video Game
Taiwan and other lo...

View ads

AFK: 새로운 여정 ✓
Video Game
South Korea

View ads

AFK Journey ✓
Video Game
Indonesia

View ads

AFK Journey ✓
Video Game
Thailand

View ads

AFK Journey ✓
Video Game

View ads

Launched March 2024

Library ID: 914630596783719 ...

🔍 Inactive
Mar 9, 2024 - Mar 12, 2024
Platforms

4 ads use this creative and text

See summary details

AFK Journey
Sponsored
🎮 Pre-register for exclusive rewards! ✨

Library ID: 2709373122553296 ...

🔍 Inactive
Mar 9, 2024 - Mar 12, 2024
Platforms

4 ads use this creative and text

See summary details

AFK Journey
Sponsored
🎮 Pre-register for exclusive rewards! ✨

Library ID: 459805569712984 ...

🔍 Inactive
Mar 9, 2024 - Mar 12, 2024
Platforms

2 ads use this creative and text

See summary details

AFK Journey
Sponsored
🎮 Pre-register for exclusive rewards! ✨

Library ID: 936819264324019 ...

🔍 Inactive
Mar 9, 2024 - Mar 12, 2024
Platforms

2 ads use this creative and text

See summary details

AFK Journey
Sponsored
🎮 Pre-register for exclusive rewards! ✨

Library ID: 983592763334912 ...

🔍 Inactive
Mar 9, 2024 - Mar 12, 2024
Platforms

4 ads use this creative and text

See summary details

AFK Journey
Sponsored
🎮 Pre-register for exclusive rewards! ✨

Library ID: 1560529911402015 ...

🔍 Inactive

Library ID: 368727616037888 ...

🔍 Inactive

Library ID: 796619312279019 ...

🔍 Inactive

Library ID: 955343725543768 ...

🔍 Inactive

Library ID: 2188957721464450 ...

🔍 Inactive

Summary Data



3 ad versions

Library ID: 994279045472478

Library ID: 994279045472478

Inactive

Jun 13, 2024 - Jun 21, 2024

Platforms

This ad has multiple versions

Assassin's Creed
Sponsored
Library ID: 994279045472478

Watch more than 12 mins of gameplay and become a Shinobi Assassin and a powerful Samurai in feudal Japan on November 15th.

Our people deserve to be freed of the oppressor's grasp.

UBISOFT.COM
Assassin's Creed Shadows Gameplay Reveal
Assassin's Creed Shadows

Order Now

This ad has multiple versions

1 of 5

European Union transparency



We provide additional information for ads that were shown on Meta technologies anywhere in the EU.

EU ad audience

Location

Advertisers can target their ads to certain audiences based on their country, region, postal code or city.

All location types

Included Excluded



Location

Location type

Included or excluded

Ireland

Country/Region

Included

Age

18-45 years old

Advertisers can choose a minimum and maximum age of who will be shown an ad.

Gender

All

Advertisers can choose to target their ad based on gender.

EU ad delivery

Reach

11,790

The number of Accounts Center accounts in the EU that saw this ad at least once. Reach is different from impressions, which may include multiple views of your ads by the same Accounts Center accounts. This metric is estimated.

Reach by location, age and gender

Summary Data



3 ad versions **Library ID: 994279045472478** ✕


Library ID: 994279045472478

🔒 Inactive

Jun 13, 2024 - Jun 21, 2024


Platforms

This ad has multiple versions

**Assassin's Creed**
Sponsored
Library ID: 994279045472478

...

Watch more than 12 mins of gameplay and become a Shinobi Assassin and a powerful Samurai in feudal Japan on November 15th.



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UBISOFT.COM
Assassin's Creed Shadows Gameplay Reveal
Assassin's Creed Shadows

Order Now

This ad has multiple versions 1 of 5



All

Advertisers can choose to target their ad based on gender.

EU ad delivery

Reach
11,790

The number of [Accounts Center accounts](#) in the EU that saw this ad at least once. Reach is different from impressions, which may include multiple views of your ads by the same Accounts Center accounts. This metric is [estimated](#).

Reach by location, age and gender

The demographic breakdown of [Accounts Center accounts](#) in the EU that saw this ad.

Location	Age Range	Gender	Reach
Ireland	25-34	Male	5379
Ireland	25-34	Female	557
Ireland	45-54	Male	203
Ireland	45-54	Female	18
Ireland	35-44	Unknown	31
Ireland	25-44	Male	2226

About the advertiser



Beneficiary and payer



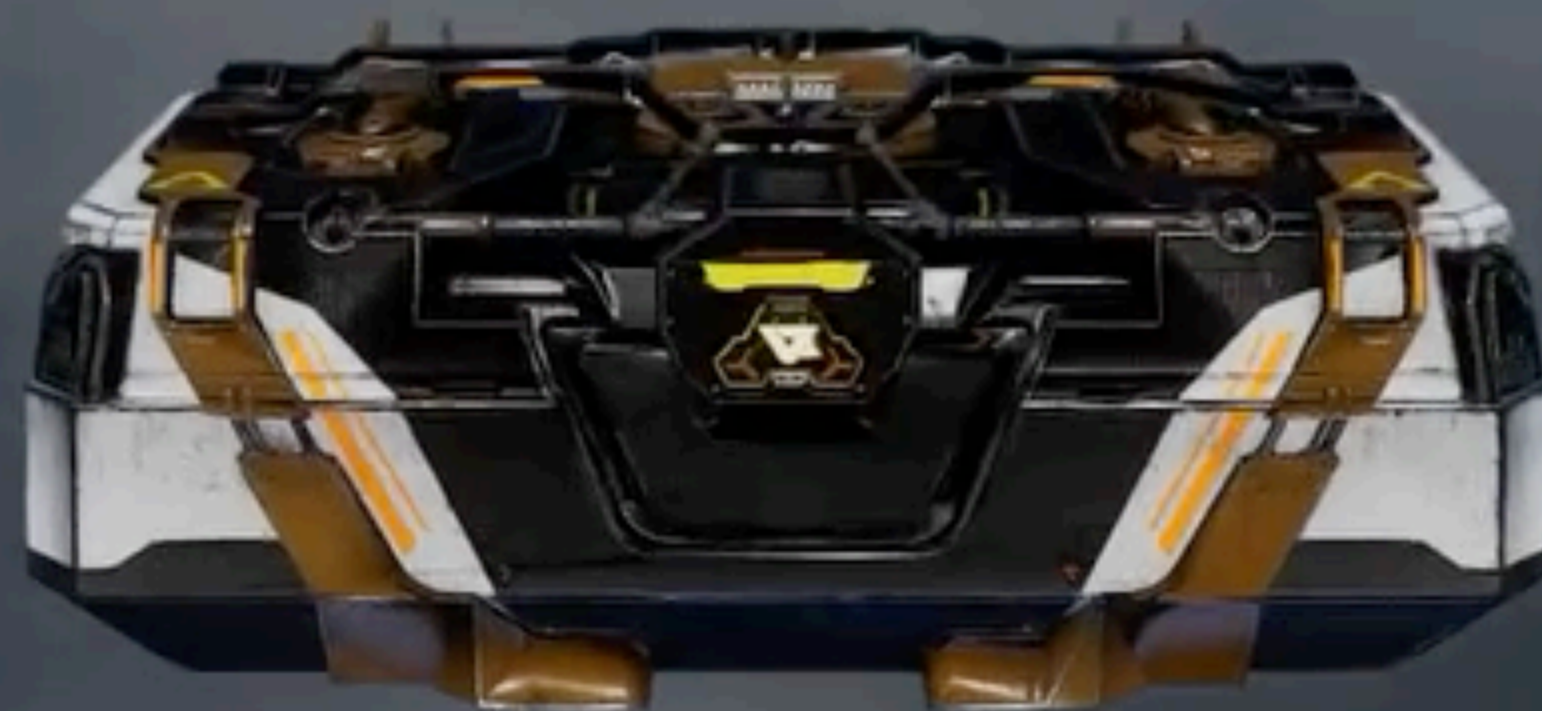
What is a loot box?

- Virtual items in video games that contain **randomised** rewards.
- Some loot boxes are **purchased with money**. Others are **obtained for free**.
- Conceptually similar to **gambling**.
- Loot box purchasing is **positively correlated** with **problem gambling**.
- Subject to public controversy and regulatory scrutiny.



Probability of AT LEAST one:

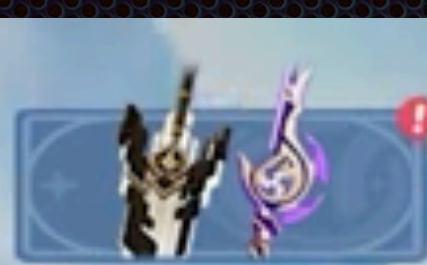
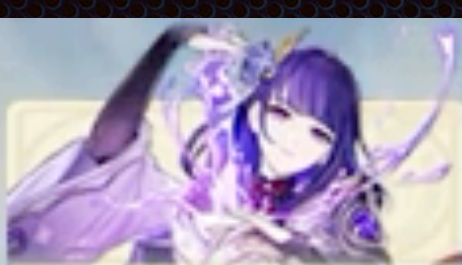
◆ Rare or Better item:	100%
◆ Epic or Better item:	24.8%
◆ Legendary item:	7.4%



© Define Human Studios



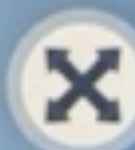
Wish



1917



0



Character Event Wish

Reign of Serenity

Probability increased!

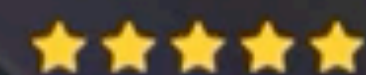
Every 10 wishes is guaranteed to include at least one 4-star or higher item.

[View Details for more.](#)

Time Remaining

20 day(s) 7 hour(s) 20 minute(s)

Raiden Shogun



Plane of Euthymia

38

2235

Shop

Details

History

Wish x1

x 1

Wish x10

x 10

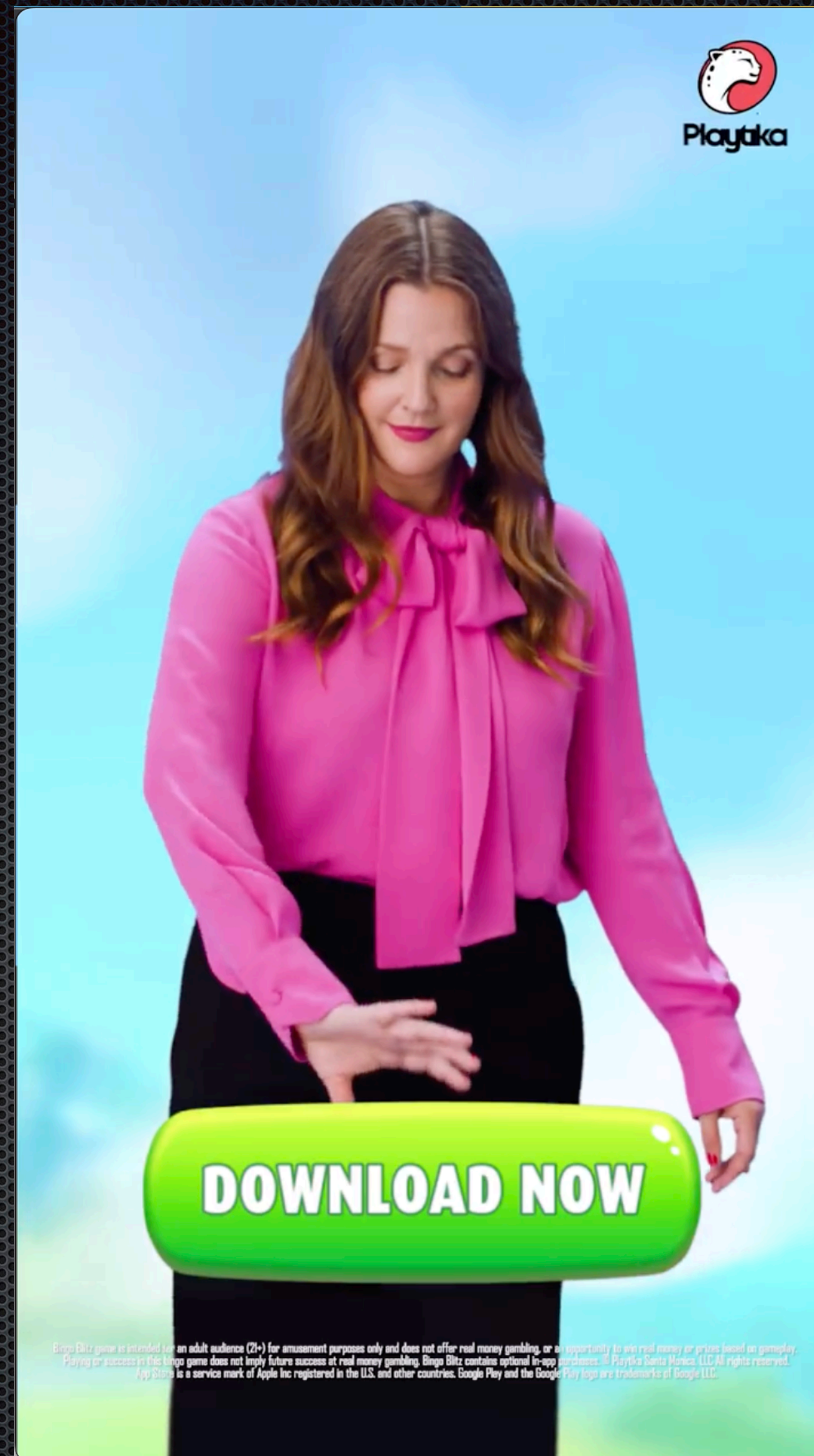
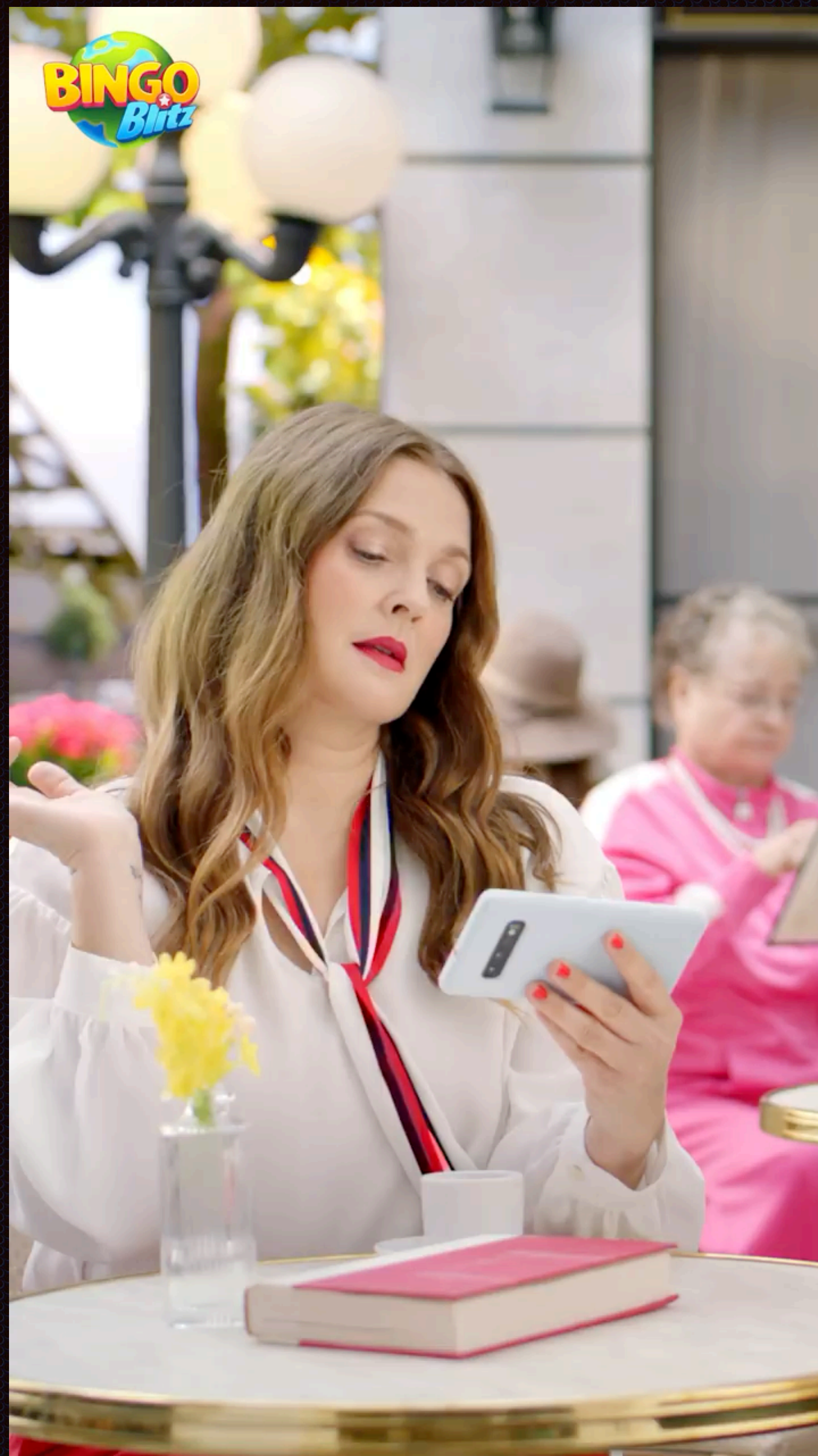
How many games contain loot boxes?

- ✦ Amongst the highest-grossing iPhone games in 2024?
 - ✦ 80%+ in the UK 🇬🇧;
 - ✦ 86% in the Netherlands 🇳🇱;
 - ✦ 90% in South Korea 🇰🇷; and
 - ✦ 97% in China 🇨🇳.



UK loot box advertising

- In the UK, any advertising of video games with loot boxes **must disclose** that the game contains loot boxes.
- The presence of loot boxes is deemed to be **material information** that a **consumer needs** to make an **informed purchasing decision**.
- A **consumer law** approach... (that applies also to EU, EEA, and many other countries)



is not offer real money gambling, or an opportunity to win real money or prizes based on gameplay. Bingo Blitz contains optional in-app purchases. © Playtika Santa Monica, LLC All rights reserved. App Store is a service mark of Apple Inc registered in the U.S. and other countries. Google Play and the Google Play logo are trademarks of Google LLC.


“Bingo Blitz contains optional in-app purchases.”

Bingo Blitz game is intended for an adult audience (21+) for amusement purposes only and does not offer real money gambling, or an opportunity to win real money or prizes based on gameplay. Playing or success in this bingo game does not imply future success at real money gambling. Bingo Blitz contains optional in-app purchases. © Playtika Santa Monica, LLC All rights reserved. App Store is a service mark of Apple Inc registered in the U.S. and other countries. Google Play and the Google Play logo are trademarks of Google LLC.

What about compliance....? 😇 or 😈?

- Only 7% of social media adverts on Meta platforms (Facebook, Instagram, & Messenger) and TikTok disclosed loot box presence as required. 😲🤔
- The vast majority of social media advertising (93%) was non-compliant with UK advertising rules 🇬🇧 and also EU consumer protection law 🇪🇺.
- In the UK alone, the 93 most viewed TikTok adverts failing to disclose loot box presence were watched over 292,641,000 times total or approximately 10 impressions per active user, conservatively estimated.

Disclosures are again hard to see

- ✦ Ads that *did* disclose also **often disclosed using very obscure methods**.
- ✦ Can people ***really see*** the disclosures? (You might need a **magnifying glass!** )
 - ✦ If not, consumer protection regulator **ought to punish the companies** even though the disclosures have ***technically*** been made.



Sign in / Sign up



Menu

Make a complaint

Quickly and easily submit your ad complaint with us online.



Electronic Arts Ltd t/a EA

Upheld | Social media (paid ad) | 20 March 2024

Two paid-for Facebook ads for Golf Clash, a mobile app game, omitted material information about the inclusion of loot boxes.



Miniclip (UK) Ltd

Upheld | Social media (paid ad) | 20 March 2024

A paid-for Facebook ad for an online game omitted material information about the inclusion of loot boxes.



Jagex Ltd

Upheld | Social media (paid ad) | 20 March 2024

A paid-for Facebook ad for online game RuneScape omitted material information about the inclusion of loot boxes.

Excuses...



Response

Electronic Arts Ltd t/a EA said that the ads were mistakenly published without the prescribed disclosure. They explained that they had a company policy which required paid ads for games that included in-game purchases and random-item purchases to contain the text “Includes optional in-game purchases (includes random items)” prominently within the ad. In ads (a) and (b), they explained that the omission of the disclosure was a result of human error and was not representative of the standard policies and practices they had in place to ensure their ads were compliant. They confirmed that the error had been resolved and the ads had been removed. They reiterated their commitment to compliant advertising.

Response

Miniclip (UK) Ltd believed that material information had not been omitted from the ad because the game did not require users to make a purchase in order to play and progress. However, they confirmed that the ad had been withdrawn after being notified of the complaint and said that future ads would not omit such material information.

Jagex believed the paid-for Facebook ad was constrained by time and space. As such, they had taken measures to ensure that consumers had all relevant information about the game by other means, before making the decision to download and play the game. They explained that the ad linked to a landing page which



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UK World Climate crisis Ukraine Football Newsletters Business Environment UK politics

Gambling

🕒 This article is more than **5 months old**

Video game firms found to have broken own UK industry rules on loot boxes

Government criticised over decision to let companies self-regulate gambling-style features after expert finds numerous breaches

The working group last met in February. Since the group was set up, Leon Xiao, an expert on loot-box regulation and PhD fellow at the IT University of Copenhagen, said hundreds of adverts for games, more than 90% of those he examined, did not abide by the group's own rule on disclosure.

A spokesperson for the Department for Culture, Media and Sport said the government had been “clear that video games companies must do more to protect children and adults from the harms associated with loot boxes”.

They said the government would monitor the impact of the industry guidelines and would “keep possible future legislative options under review”.



Mobile game ads 'breaking advertising rules' on social media - as clip featuring Beckham slammed



By [Narbeh Minassian](#), news reporter

Adverts for mobile games across social media could be flouting regulations as an expert tells Sky News hundreds may be leaving out key details around in-app purchases.

The latest accused of falling foul of advertising standards was a [30-second clip promoting Coin Master](#) - a popular village-building and slot machine game - featuring David Beckham.

Question



Lord Foster of Bath

Liberal Democrat

Life peer



To ask His Majesty's Government, following further breaches of the Advertising Standards Authority codes on publicising the availability of loot boxes by members of the DCMS technical working group on loot boxes, what steps they will take to ensure that the codes and their oversight are strengthened.

Question



Lord Foster of Bath

Liberal Democrat

Life peer



To ask His Majesty's Government what steps they are taking to ensure that companies, such as Meta, appropriately regulate advertisements on their platforms to ensure compliance prior to publication; and whether they will consider imposing a ban on platforms that repeatedly fail to do so.



HOUSE OF LORDS

Question



Lord Foster of Bath

Liberal Democrat

Life peer



To ask His Majesty's Government, following the recent breach of the Advertising Standards Authority codes by DCMS Technical Working Group members Electronic Arts, Jagex, and Hutch Games, what steps they are taking to (1) evaluate, and (2) ensure compliance with, industry-led principles and guidance on the use of paid loot boxes in computer games.



Top-selling mobile games breaking rules on loot boxes

Ads for games are meant to say if they contain loot boxes - BBC News has found most do not.

In 2024,
91%
non-compliance



com2us

MOJITO
GAMES

STARSEED



카나타



유리



시아



메아



레이호우

스타시드에서
인간님을 기다릴게요



15세 이용가
확실히 아이템 포함

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확률형 아이템 포함

Did anything change?

- ✦ Only 7% disclosure rate in September 2023 amongst 300+ ad in the UK. 🇬🇧
- ✦ In late 2024, we did a BIGGER study.
 - ✦ 8.4% disclosure rate in the UK ($n = 1330$). 🇬🇧
 - ✦ BUT, only 28.6% were visually prominent, so 2.4% compliance rate.
 - ✦ 7.6% in South Korea ($n = 1028$), but 58.2% for Korean language ads. 🇰🇷

Illegal advertising in Belgium? 🇧🇪

- ✦ Belgium “banned” all paid loot boxes and social casino games, so they *should no longer be available* on the market.
- ✦ However, the law is not enforced, so *82 of the 100* top iPhone games sold them.
- ✦ But besides failing to remove loot boxes, did companies *pay to illegally advertise* on Belgian social media?



Widespread illegal advertising

- We found social media ads for 172 popular games with illegal gambling.
- We studied 1,574 advertisements, which were viewed over 4.5 million times by Belgian users, including 1.26 million times by under-21s.
- The one single most widely circulated ad was for *Harry Potter: Puzzles & Spells* and reached nearly 400,000 unique Belgian users.
- Belgium has a population of 11.8 million, meaning that 3.4% of the entire country saw that one single ad.

Ad Details



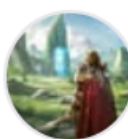
Inactive

Library ID: 1889099111512466

May 17, 2024 - May 20, 2024

Platforms

This ad has multiple versions



드래곤에어 : 침묵의 신

Sponsored

Library ID: 1889099111512466



🔥100만 가지가 넘는 자유로운 영웅 조합!🔥 오픈 월드 고품격 판타지 RPG! 🔥마법. 몬스터. 마스터리. 🔥아덴시아를 구할 자격이 있음을 증명하세요!



European Union transparency



We provide additional information for ads that were shown on Meta technologies anywhere in the EU.

EU ad audience

Location

Advertisers can target their ads to certain audiences based on their country, region, postal code or city.

All location types

Included Excluded



Location ↑

Location type ↑↓

Included or excluded ↑↓

Belgium

Country/Region

Excluded

Slovakia

Country/Region

Excluded

Worldwide

Region

Included

Age

18-65+ years old

Advertisers can choose a minimum and maximum age of who will be shown an ad.

Ad Details✕

🔍 Inactive

Library ID: 1032140541783241

Sep 12, 2024 - Sep 18, 2024

Platforms    

This ad has multiple versions ℹ️



Dragon Ball Z Dokkan Battle

Sponsored

Library ID: 1032140541783241



350 Million Global DLs Reached



European Union transparency⬆️

We provide additional information for ads that were shown on Meta technologies anywhere in the EU.

EU ad audience

Location ℹ️

Advertisers can target their ads to certain audiences based on their country, region, postal code or city.

All location types ▼

☒ Included ☐ Excluded ▼ ℹ️

Location ↑	Location type ↑↓	Included or excluded ℹ️ ↑↓
Belgium	Country/Region	Excluded
Europe	Region	Included

Age ℹ️

18-65+ years old

Advertisers can choose a minimum and maximum age of who will be shown an ad.

Gender ℹ️

Not targeting under-24s in NL 🇳🇱

- 230 ads from all Dutch gambling licensees (up to 10 each; many did not advertise)
- 7.8% (18 of 230 ads) disclosed that they illegally targeted under-24s.
- Two gambling operators, including the state-owned operator, admitted to failings and promised to improve future compliance.



Ad Details

×

✓ Active

Library ID: 559622930390440

Started running on Jan 2, 2025

Platforms  

This ad has multiple versions 



Holland Casino Online

Sponsored

Library ID: 559622930390440



Gezelligheidsdieren opgelet! Check ons Live Casino, maak kennis met Live Dealers en win met roulette, blackjack en baccarat!



Age 

25-65+ years old



Advertisers can choose a minimum and maximum age of who will be shown an ad.

Gender 

All

Advertisers can choose to target their ad based on gender.

EU ad delivery

Reach

154,455

The number of [Accounts Center accounts](#) in the EU that saw this ad at least once. Reach is different from impressions, which may include multiple views of your ads by the same Accounts Center accounts. This metric is [estimated](#).

Reach by location, age and gender 

The demographic breakdown of [Accounts Center accounts](#) in the EU that saw this ad.

Location ↑

Age Range ↑↓

Gender ↑↓

Reach ↑↓

Ad Details



✓ Active

Library ID: 1775809769863876

Started running on Jan 29, 2025

Platforms



Holland Casino

Sponsored

Library ID: 1775809769863876

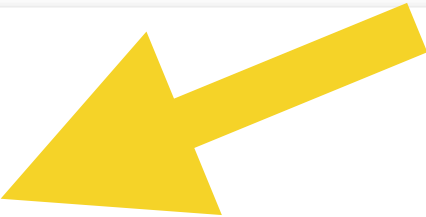


Vier Chinees Nieuwjaar bij Holland Casino



Age ⓘ

18-65+ years old



Advertisers can choose a minimum and maximum age of who will be shown an ad.

Gender ⓘ

All

Advertisers can choose to target their ad based on gender.

EU ad delivery

Reach

69,800

The number of [Accounts Center accounts](#) in the EU that saw this ad at least once. Reach is different from impressions, which may include multiple views of your ads by the same Accounts Center accounts. This metric is [estimated](#).

Reach by location, age and gender ⓘ

The demographic breakdown of [Accounts Center accounts](#) in the EU that saw this ad.

Location ↑	Age Range ↑↓	Gender ↑↓	Reach ↑↓
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Close

We asked our media partner how it could happen that the advertisements you referred to received so many views within the 18-24 age group, as it is a standard requirement that they set up campaigns on social media for 24+. Our media partner checked all settings and unfortunately found that an error was made in the settings of the two advertisements related to Chinese New Year. For all Chinese New Year campaigns, the primary target group was set correctly (25 to 55), but there is also a secondary age filter, the so-called advantage+ targeting. This secondary age filter instructs to search outside the initial target group if views are lagging and is standardly set to 18+ within Meta. It was found that our media partner did not set this secondary filter to 25+ for a number of Chinese New Year advertisements. This is an exception but is, of course, regrettable.

To prevent this error from recurring in the future, we will first consult with Meta to see if the secondary age filter can be set to 25+ by default on Holland Casino's accounts. This way, no human action is required, eliminating the risk of incorrectly setting the secondary age filter. If this is not possible, we will work with our media partner to establish a process to prevent this in the future.

As requested by you, the two advertisements related to Chinese New Year have also been deactivated.

Conclusions

- ✦ Video game context: Widespread **non-compliance** and **non-enforcement**
- ✦ Gambling context: **Better compliance** possibly due to **better enforcement?**
- ✦ Lots of research and enforcement **opportunities**
- ✦ The EU and beyond should legally **require more data access** to allow the public to scrutinise tech companies.

Thanks for listening! Questions!

- ✦ Email: leon.xiao@cityu.edu.hk
- ✦ X (Twitter): [@LeonXiaoY](https://twitter.com/LeonXiaoY)
- ✦ Bluesky: [@leonxiao.com](https://bsky.app/profile/leonxiao.com)
- ✦ LinkedIn: [linkedin.com/in/leon-xiao/](https://www.linkedin.com/in/leon-xiao/)
- ✦ Website: leonxiao.com