

The Rise of Pseudo Pages:

Threats to Tourism and Consumer Trust

How the biggest digital monopoly fails to preserve safety and online integrity

With case study insights from



Van Gogh Museum, Netherlands



Museus e Monumentos de Portugal



Duomo di Milano, Italy



Sagrada Familia, Spain

Contributing authors:

European Experience Alliance, iconomy, GetYourGuide

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Preface



Björn Borrmann

Director of Legal, Public Policy
& Governmental Affairs at
GetYourGuide

Today, travel experiences represent the fastest-growing category in the overall tourism industry, with younger generations increasingly prioritizing cultural and immersive activities over luxurious hotels or transportation. Travel is no longer only about how we get to our destination, or where we stay – it is about what we do there, what we experience, and what we will remember long after coming back home. And just like the rest of the travel industry, discovery, comparison and booking is shifting online with an ever-increasing need for platforms, service providers and touristic offerings to reach the travellers where they are: behind their phones and laptops instead of a traditional travel agency or at the hotel reception. Therefore, safeguarding this burgeoning sector as it is moving online is critical – because where travel planning and decision making moves online, scammers and intransparent business practices are not far.

Pseudo pages pose to be one of the most significant threats to travellers, cultural institutions, and the broader tourism ecosystem. These deceptive websites exploit search engine algorithms to impersonate legitimate offerings: misleading travellers, inflating prices, and diverting revenue from official institutions. The consequences are profound: cultural institutions and small businesses offering authentic experiences suffer financial losses, reputational harm, and operational disruptions, while tourists lose valuable time and miss opportunities to engage with authentic heritage.

The European Union has recently adopted new flagship laws to combat these practices: the Digital Markets Act (DMA) and Digital Services Act (DSA). While mainly focusing on the spread of fake content on digital consumer platforms and fake shops in today's ecommerce sector, these new rules also apply to other sectors and can also help safeguard the travel experiences industry and fair and transparent market practices in tourism as a whole.

As Director of Legal, Public Policy and Governmental Affairs at GetYourGuide, I am proud to introduce this critical policy paper addressing the rise of pseudo pages in the tourism sector. GetYourGuide, as Europe's leading travel experiences platform, has been at the forefront of digitalising the travel industry, empowering millions of travellers to access authentic and meaningful experiences.

In order to support a sustainable and fair travel experiences industry across the EU, we also support regulators to create and enforce legislation and standards. Additionally, we'd like to ensure that dominant digital players like Google can ensure fairness and transparency in digital markets and act against illegal content. Yet, as this paper reveals, continued inaction and evasive design choices undermine the intent of these laws, and thus our industry. The unchecked proliferation of pseudo pages risks eroding trust in Europe's tourism brand, which is rooted in quality, authenticity, and accessibility.

This paper calls for stronger enforcement of the DMA and DSA to restore trust between cultural institutions, intermediaries, and consumers. By addressing these challenges, we can protect Europe's cultural heritage, enhance the visitor experience, and ensure the long-term sustainability of the travel experiences sector. I invite you, dear reader, to join us in this endeavor to safeguard the integrity of Europe's tourism landscape.

Executive Summary

Across the European tourism landscape, consumers are discovering a myriad of travel experiences through search engines and online platforms. Unfortunately, far too many consumers fall prey to fraudulent or misrepresented travel offerings during this online discovery phase. Distinguishing between legitimate experience operators and deceptive intermediaries has become an acute challenge. These scams not only harm individual tourists but also undermine the operations, reputation, and cultural mission of heritage institutions and official experience providers.

This paper examines the rapid growth of the global economy for travel experiences, commonly referred to as the “Things To Do” sector, and its digital transformation. We explore how global search infrastructure, particularly that of Google by Alphabet, has reshaped the way travellers discover and access cultural experiences, and how the design of these systems can inadvertently favour the visibility of fraudulent or misleading websites over those of official providers.

Through interviews and case studies with stewards of UNESCO World Heritage sites and major European cultural institutions, we document the operational and reputational harm caused by the proliferation of pseudo pages and unauthorized resellers. These institutions have repeatedly raised concerns with

online platforms, yet little substantive change has occurred—prompting calls for greater regulatory intervention.

In partnership with data provided by the European online travel platform GetYourGuide, we analyse the structural biases embedded within Google’s search and online advertisement ecosystem, demonstrating how it may systematically elevate pseudo pages over official ones. This analysis is complemented by direct comparisons between fraudulent and official websites for key heritage sites across Europe.

Finally, this paper offers an overview of the current legal and regulatory frameworks, including the Digital Services Act and Digital Markets Act, and concludes with a series of targeted policy recommendations aimed at restoring digital fairness and protecting cultural institutions.

The authors of this paper argue that at stake is more than just economic integrity or operational efficiency. Pseudo pages with fraudulent offerings erode the opportunity for travellers to engage deeply with heritage, to form lasting memories, and to cultivate empathy across borders. In this light, the unchecked proliferation of pseudo pages not only damages the reputation of Europe’s cultural institutions, but also poses a structural threat to the accessibility, affordability, and social function of global travel itself.

Introduction

The Surge of the “Things To Do” Segment in Global Tourism

The rise of the „Things To Do“ sector—encompassing tours, activities, and cultural attractions—marks one of the most dynamic shifts in modern travel experience and the global tourism economy. Once reliant on physical travel agents, tourist guides and cultural institutions, this market has rapidly digitalised, driven largely by the dominance of search engines and online platforms. This shift, accelerated by the growth of Online Travel Agencies (OTAs) and evolving consumer demand for authentic, experience-based travel, has positioned the experiences market as one of the fastest-growing segments in tourism worldwide. Consumer desire for amazing experiences are driving the growth of travel sales to USD3.6 trillion by 2029.¹

In 2021, Google launched its “Things To Do” feature, effectively consolidating its influence as both a discovery engine and a marketplace for experiences. With over 90% of the EU’s search engine market share², Google’s algorithms and advertising infrastructure now exert unparalleled control over visibility, access, and consumer behavior in this space. This gatekeeping function, while technologically innovative, has also introduced new vulnerabilities—leading among them the proliferation of deceptive “**pseudo pages**.” These sites exploit Google’s ranking design and advertising systems to impersonate legitimate ticketing platforms and tourist attractions, often misleading consumers, inflating prices, and diverting traffic away from official cultural institutions.

The relevance of Google Search for the digital ecosystem as a whole and the online travel industry cannot be overestimated. Subsequently, Alphabet is designated as a gatekeeper for online search under the DMA which, amongst other things, bans self-preferencing of Alphabet’s other services within the Google search results. Additionally, Google Search is designated as a Very Large Online Search Engine (VLOSE) under the the DMA’s sister law, the Digital Services Act (DSA), and must comply with its obligations for managing risk and ensuring transparency.

This paper argues that the unchecked spread of pseudo pages is more than a consumer protection issue—it is a regulatory failure that undermines trust in both digital markets and cultural tourism. Through case studies and legal analysis, we demonstrate how these practices violate core tenets of the DSA, harm public institutions, and distort fair competition. Addressing this issue is not only necessary for preserving the integrity of Europe’s cultural heritage sector—it is a matter of legal accountability under the EU’s digital framework.

Defining the “Things To Do” / Travel Experiences Sector

Today’s travellers, especially Gen Z and Millennials, are prioritizing experiences over possessions. Nearly half of global travellers now seek exploration and adventure when they travel, and over 52% of this aforementioned group allocate more budget to experiences than any other generation. This generational shift is often described through the lens of „nownership“—the preference for spending on memorable experiences rather than accumulating material goods.³

Supporting this trend, recent research from Expedia highlights the growing centrality of experiences in contemporary travel planning, particularly for families. In their latest global survey, 55% of respondents cited outdoor activities as a priority when planning family trips, followed by visits to historical landmarks (44%), museums (38%), and guided tours (26%). This data supports the broader consumer shift toward valuing meaningful, immersive activities over material goods. While early narratives often credited Millennials with driving the „experience economy,“ the trend has since become deeply embedded across demographics. Notably, Generation Alpha, who are digital natives and keen smartphone users, already play a significant role in shaping family travel choices, especially around destinations and activities. This intergenerational demand for engaging, culturally rich experiences continues to reshape travel consumption patterns worldwide.⁴

¹Euromonitor, 2024

²Statista, 2024

³Frontier Economics, 2018

⁴Expedia, 2020

The growth of Online Travel Agencies (OTAs) in the experiences market is fundamentally tied to the broader digitalisation of activities and attractions. Historically, booking cultural sites, guided tours, and unique local experiences required physical visits to travel agents or on-the-ground kiosks, limiting both the reach and efficiency of these transactions. With the rise of digital platforms, OTAs have transformed this landscape by aggregating and distributing a vast array of experiences online, making them searchable, comparable, and bookable from anywhere in the world. This shift has not only expanded access for consumers but also created a scalable, data-driven marketplace that fuels the continued growth of the sector.⁵

The role & relevance of Google and Search Engines in the Tourism and „Things To Do“ Industry

Recognizing the importance of this segment, Google launched “Things To Do” in beta in August 2021⁶, replacing its earlier “Reserve with Google” product. The platform aims to help travellers discover unique experiences while enabling attractions, tour operators, and activity providers to surface their inventory through “free listings and dynamic ads”. As Google positions it:⁷

“We’re working to help travellers discover new and unique things to do and to make it easier for partners to promote their tours, attractions, and activities and connect with interested travellers.”

Google’s dominance as the world’s most-used search engine means it plays a critical role in shaping traveller choices. Data from Statista⁸ has highlighted that Google’s search engine controls 92 to 93% of the market share in most of the Member States in the EU, and in some cases over 95%. This data concerns searches conducted not just on desktop computers but also on mobile devices, which have grown exponentially. Furthermore, data from Google highlights that in the 12 weeks before a trip, travellers conduct eight times more searches for experiences than flights, and three times more searches for experiences than accommodations.⁹ This underscores the strategic value of visibility in search results for those operating in the Things To Do space.

As consumer interest in experiences grows and search engines like Google become essential, its market dominance brings significant impact to user behaviour in discovery and booking. The presence of deceptive pseudo pages poses a serious threat—not only to travellers but also to legitimate providers. This paper explores how malevolent pseudo pages exploit these market dynamics, their impact on the tourism ecosystem, and what can be done to address this growing issue.

The Rise of Pseudo Pages in Things To Do

Despite its advances in AI and digital infrastructure, Google remains, at its core, the world’s largest advertising company. This reality underpins much of the tension surrounding its role in the travel experiences market. In April 2025, the U.S. Department of Justice reinforced this view in an antitrust case, alleging¹⁰ that Google has secured a dominant position in the digital advertising ecosystem by controlling substantial portions of both ad supply and demand. Within this framework, Google’s Search Engine Results Pages (SERPs)—which blend organic results, paid ads, and curated features—serve as the primary gateway for online discovery.

A concerning byproduct of this advertising-centric model is the proliferation of **pseudo pages**: deceptive web pages that mimic legitimate businesses or cultural institutions to attract traffic and mislead consumers. These pages often use black-hat SEO tactics like keyword stuffing, cloaking, and scraped content to game Google’s algorithms. They may also pay for prime placement via Google Ads, allowing them to appear prominently on SERPs alongside—or even above—official listings.¹¹

The motivations behind pseudo pages vary, but most share a common goal: financial gain. Some divert traffic from legitimate venues and resell tickets at inflated prices. Others engage in affiliate fraud, ad arbitrage, or even phishing. Whatever the mechanism, the result is a degraded user experience, financial loss for consumers, and reputational harm to authentic providers, especially museums, cultural sites, and tour operators.

While Google publicly maintains that it combats such manipulation—stating in its own policies¹² that its systems are designed to prevent spammy or manipulative

⁵ Skift, 2024

⁷ Google, undated

⁹ Google, 2019

¹¹ Google, 2019

⁶ Arival, 2021

⁸ Statista, 2024

¹⁰ US Office of Public Affairs, 2025

¹² Google, 2019

sites from rising in search rankings—the persistence of pseudo pages suggests otherwise. The scale of Google’s advertising ecosystem may have outpaced its ability (or willingness) to effectively police abuse¹³. More troubling still, these pseudo pages generate ad revenue, raising questions about Google’s incentives to proactively remove them. In 2024 alone, Google generated \$234.2 billion in ad revenues—an overwhelming share of Alphabet’s total earnings—pointing out to the potential conflict between user protection and profit.¹⁴ This paper contends that the presence and spread of pseudo pages represent more than a

technical or consumer protection issue—they expose deep structural and regulatory shortcomings. In the context of the EU’s Digital Services Act, the persistence of these deceptive practices raises serious compliance concerns. As a Very Large Online Platform, Google is legally obligated to mitigate systemic risks, ensure advertising transparency, and prevent the misuse of its platform for manipulation or fraud. The unchecked rise of pseudo pages suggests not only lapses in enforcement, but a broader failure to prioritize the integrity of digital marketplaces over the monetization of user attention.

Regulatory Background

Digital Services Act and Illegal Content Online

The increasing visibility of pseudo pages in the “Things To Do” sector, and their deceptive commercial practices, has prompted growing regulatory attention in the European Union. The most significant and recent development is the **Digital Services Act (DSA)**¹⁵, a landmark EU regulation that came into full effect in 2024. The DSA introduces a harmonized legal framework for digital services operating within the EU, with the primary objective of creating a safer and more transparent online environment. In the context of tourism and online travel experiences, the DSA provides a new legal basis for addressing the harmful impact of pseudo pages that impersonate attractions, museums, or cultural institutions in order to mislead consumers or resell tickets under deceptive pretenses.

Under the DSA, platforms that host or index deceptive or illegal content—such as pseudo pages impersonating cultural institutions or misrepresenting ticket offerings—can be held accountable when they fail to take appropriate action. Article 16 of the DSA requires all hosting services to establish an accessible and user-friendly notice-and-action mechanism. This mechanism allows third parties, including affected institutions such as museums or tour operators, to notify the platform of illegal content and request its removal. **Once such a notice is received, the platform is obliged to act “expeditiously” to remove or disable access to the content.** The failure to do so can result in the loss of liability exemptions normally granted under Article 6 of the DSA.

When pseudo pages involve practices such as im-

personation, fraud, or the unauthorised resale of services in misleading ways, these may violate not only the DSA but also underlying national laws on unfair commercial practices or consumer fraud, which the DSA is designed to reinforce. Although the DSA does not define illegal content per se, it explicitly defers to existing EU or Member State laws (Recital 12 and Article 3(h)) to determine what qualifies as such. This means that cultural institutions, attractions, and experience providers have the legal basis to report pages that breach consumer law or intellectual property rights as “illegal content” under the DSA framework.

Crucially, for platforms that qualify as Very Large Online Search Engines (VLOSEs), defined in Article 33 as search engines with more than 45 million average monthly active users in the EU (a threshold that Google exceeds), the obligations are more stringent. **VLOSEs must conduct systemic risk assessments related to the dissemination of illegal content** (Article 34) and adopt risk mitigation measures proportionate to the identified risks (Article 35).

For example, if Google becomes aware that pseudo pages are systematically misleading consumers, it may be required to adjust its indexing practices, ranking algorithms, or ad presentation logic to reduce visibility of such content. In addition, Article 38 obliges search engines to provide clear explanations of the main parameters determining the ranking of search results, increasing transparency and potentially enabling affected institutions to better understand how these pages gain prominence.

¹³ [Computer Law & Security Review, 2022](#)

¹⁴ [Statista, 2024](#)

¹⁵ [EUR-LEX, 2022](#)

Procedural Tools Available to Monuments and Ticket Providers

While the DSA introduces the notion of “trusted flaggers” under Article 22, the provision is mostly relevant for organizations that meet specific independence and expertise criteria. In practice, however, monuments, cultural institutions, and tour operators do not need to become trusted flaggers to benefit from the DSA. Instead, they can follow a three-step approach:

1. Submit a formal notice via the hosting platform’s or search engine’s reporting mechanism (Article 16).
2. Request a statement of reasons if the report is rejected or ignored (Article 17).
3. Escalate the matter to their national Digital Services Coordinator (DSC) under Article 49, which allows competent authorities to issue binding orders for content removal or information disclosure.

These procedures are designed to be accessible and actionable, especially for smaller institutions that may lack specialized legal capacity. However, the effectiveness of these rights depends heavily on timely

and meaningful platform compliance, an area where significant challenges remain.

Alphabet has publicly committed to compliance with the DSA, including the publication of mandatory transparency reports and systemic risk assessments in accordance with Articles 15, 42, and 45. These reports are accessible via Google’s Transparency Center¹⁶. Yet, while the infrastructure for compliance exists, the scale, speed, and responsiveness of platform actions have so far fallen short of delivering the intended safeguards for European consumers and legitimate businesses.

This enforcement gap poses a clear risk: **pseudo pages continue to operate visibly and profitably within the digital ecosystem**, eroding public trust, diverting revenue from official institutions, and exposing users to scams. If the DSA is to achieve its stated goals, especially in sectors where consumer deception has real-world consequences, it must be implemented not only formally, but effectively and at scale.

The DSA’s sister legislation, the DMA, also includes an obligation for Alphabet to apply “fair, reasonable, and non-discriminatory general conditions of access for business users to its [...] online search engines” which expands the legal basis to counter the visibility of pseudo pages on Google Search further, as they clearly constitute unfair market practices.

¹⁶ [Transparency Centre, Google, undated](#)

The Mechanics of Pseudo Pages in Tourism

Google's dual role in the proliferation and limitation of pseudo pages

Google's ineffectiveness of policing pseudo-pages stems from the duality of roles it currently holds: the world's most used search engine and the owner of the world's most used advertisement marketplace. In 2019, Google presented a whitepaper titled "How Google Fights Disinformation"¹⁷ at the Munich Security Conference. While Google does not explicitly admit it in the paper, they are clearly acknowledging that:

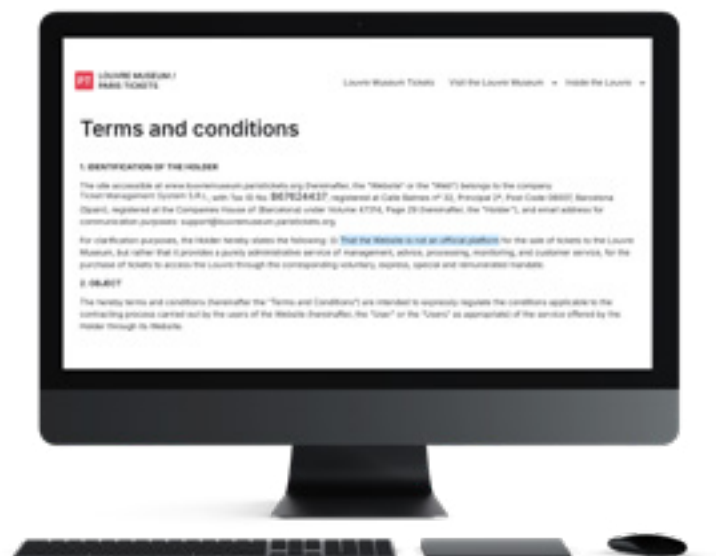
- The problem of scam pages is too complex and widespread to be fully controlled.
- Scammers and bad actors are constantly evolving, often ahead of enforcement.
- Their systems catch a lot – but not everything – and enforcement is often reactive.
- They rely on collaboration because their internal capacity has limits.

Since then, generative artificial intelligence tools allow anyone to quickly and easily create massive amounts of fake content.¹⁸

Examples of Pseudo Pages in "Things To Do"

The following websites are illustrative of the illusion of officiality frequently created by pseudo pages. While some of these sites do offer services similar to those provided by official attraction operators, such as entry tickets, they often do so at significantly higher price points. The misleading nature of these platforms lies in their presentation: they fre-

quently mimic the appearance and tone of official sites, thereby confusing consumers. In one example involving ticket sales for the Louvre Museum, it is only upon scrolling to the bottom of the Terms & Conditions page that the website discloses its unofficial status. There, it states: "The Website is not an official platform for the sale of tickets to the Louvre Museum, but rather that it provides a purely administrative service of management, advice, processing, monitoring, and customer service, for the purchase of tickets to access the Louvre through the corresponding voluntary, express, special and remunerated mandate." This kind of disclaimer, buried in fine print, exemplifies how these platforms obscure their true nature while profiting from the official brand.



¹⁷ Google, 2019, retrieved via Kopp

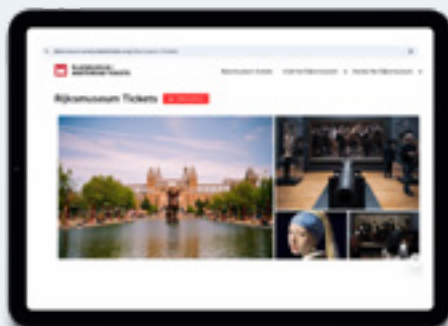
¹⁸ Deutsche Welle Akademie, 2024

Comparison of pseudo websites to official websites

as run by TICKET MANAGEMENT SYSTEM SL with Spanish registered tax number NIF/CIF: B67624437

pseudo website

Pseudo Page: Rijksmuseum



 rijksmuseum.amsterdamtickets.org

 Ticket price for "General Admission": €35

official website

Official Site: Rijksmuseum



 www.rijksmuseum.nl

 Ticket price for "Entrance Adult": €25

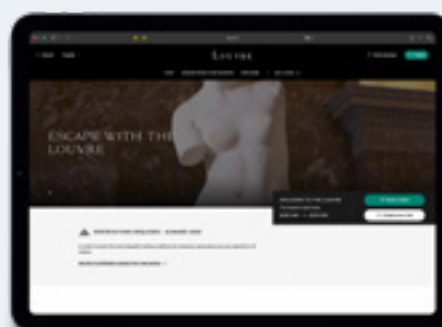
Pseudo Page: Louvre Museum



 louvremuseum.paristickets.org

 Ticket price for "Louvre Tickets": €32

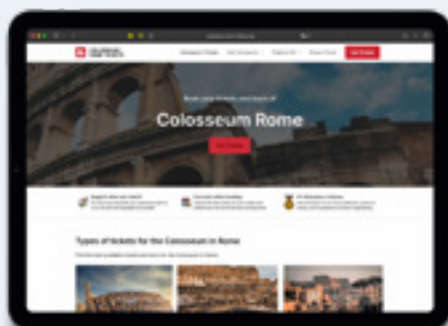
Official Site: Louvre Museum



 www.louvre.fr/en

 Ticket price for "Full Rate": €22

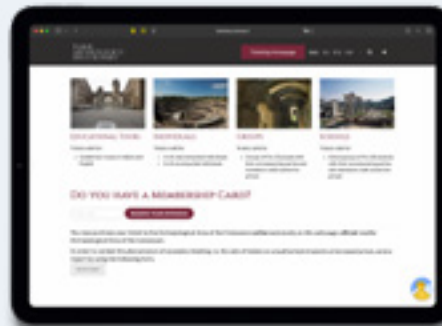
Pseudo Page: Colosseum



 <https://colosseum.rome-tickets.org/>

 Ticket price for "Full Access Ticket": €30

Official Site: Colosseum

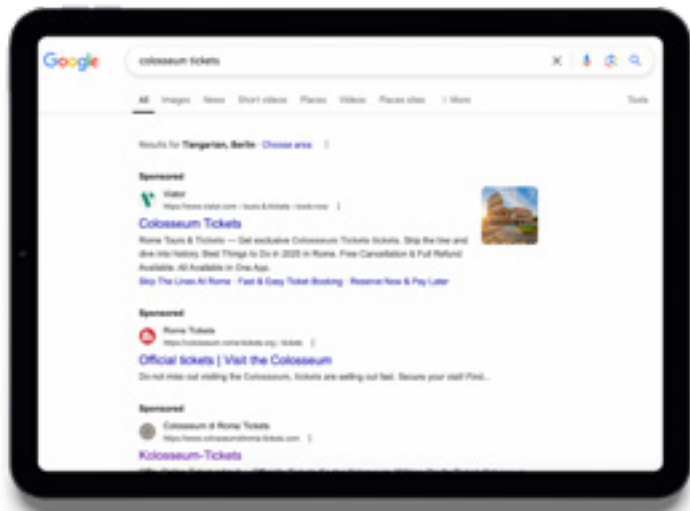


 ticketing.colosseo.it/en/

 "Full Experience Ticket": €24

The Mechanics of Pseudo Pages in Tourism

Although these ticket providers are not official and they clearly provide the same products at a higher price, the URL of the pseudo pages rank relatively high on the SERP. See example below for Colosseum tickets:



Google's Role in Fighting Scam Pages

In a more recent public policy blog post¹⁹, Google further acknowledges that scams and online fraud are growing global issues that harm consumers, businesses, and the broader internet ecosystem. Google positions itself as committed to combating these issues and outlines a set of policy recommendations for governments, businesses, and technology platforms to work together toward a safer online environment.

Google emphasizes that collaborative efforts are essential, especially as scammers evolve and adopt increasingly sophisticated techniques. While it invests heavily in detection and enforcement, bad actors continuously look for new loopholes to exploit. Google called for the following recommendations:

- **Clear and consistent regulations to define illegal behaviors and set expectations for online platforms.**
- **Strong enforcement mechanisms to take action against fraudsters.**
- **Cross-sector collaboration between governments, platforms, and industry partners to share threat intelligence.**
- **Consumer education and awareness to help users avoid falling victim to scams.**

Google claims to remove billions of ads and take down deceptive sites annually, but acknowledges more must be done collectively to address the scale and sophistication of modern scams.

Pseudo pages represent a specific, persistent threat that exploits the very gaps Google admits are difficult to police effectively. These fraudulent pages masquerade as legitimate attractions or ticketing sites, using Google Ads and SEO manipulation to gain high visibility in search results—often even ranking above official providers.

According to Google's own policy paper, pseudo pages thrive because:

- **Search engine algorithms prioritize paid ads and SEO-optimized content, often over authenticity and user safety.**
- **Policing such pages at scale is resource-intensive, and platforms like Google cannot always act swiftly or decisively.**
- **Bad actors adapt rapidly, re-creating or cloning pseudo pages even after takedowns.**
- **Consumers lack awareness and assume that top search results (especially those with ads) are trustworthy.**

The authors of this paper agree that these recommendations by Google are laudable. However, Google shifts the focus away from its own role in the proliferation of pseudo pages. The reality is that search engine without pseudopages would be a world with significantly less revenue for Google.

The intricacies of pseudo pages in Things To Do

Misrepresented budgets to obfuscate rankings on price

Despite existing curation practices, including AI screening tools²⁰, pseudo pages continue to appear in search results, often posing as official sites. These misleading pages divert traffic away from legitimate businesses and, in more serious cases, misrepresent the services or experiences being offered.

According to Google's own terms and conditions, if someone claims to be an official reseller without authorisation, this would be considered confusing,

¹⁹ Google, 2024

²⁰ Google, 2024

deceptive, or misleading. Therefore, the pseudo page should be removed, and the fraudulent reseller should be suspended from running Google Ads.

However, in recent months Google has made it increasingly difficult for other businesses to report violations and has further limited the information it shares regarding the follow-up to these reports. This closely fits an existing pattern whereby successive iterations of Google's products - e.g. the most recent versions of Google Ads' offering - further throttle the data shared with users and businesses.

Additionally, despite Google's promised improvements to its Booking Module, pseudo pages continue to successfully exploit the system. By misrepresenting products and services with a low price, unofficial resellers can show up on top of the results list and draw additional attention to their offering while limiting opportunities for legitimate offerings from official websites and travel agents. Additionally, this causes friction for the entire ecosystem, as consumers end up buying the wrong product (e.g. a bus transfer to a landmark instead of an entry ticket to a landmark), buying a misrepresented product (e.g. a ticket with a specific timeslot instead of a day pass), or end up paying excessive booking and service fees for a product believing to be offered on an official site.

As this example for the Rijksmuseum in Amsterdam clearly indicates, grouping similar offers and ranking them solely based on price encourages faster, ill-informed buying decisions. As has been argued in an online workshop with the DMA Enforcement team on 15 October 2024, Google is actively encouraging a race to the bottom, causing artificial downward pressure on tour operators' wide-ranging and diverse offerings. This decreases the quality of offerings and thereby hurts consumers.

Microsites and their visibility on the SERP

Testing by in-house analysts at the online travel experiences platform, GetYourGuide, reveals several key insights into online marketing strategies using

dedicated pseudopages and microsites. (Microsites are bite-sized, standalone web pages or small websites with unique URLs and designs.)²¹

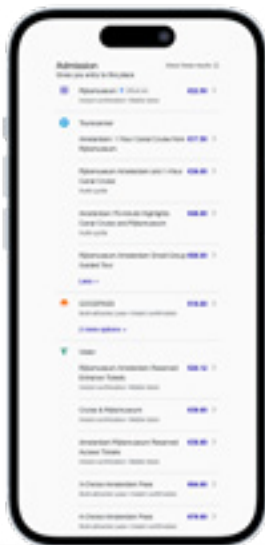
One study aimed to evaluate whether using microbrand domains for campaigns increases click-through rates (CTR). (CTR is the number of clicks that an advertisement receives divided by the number of times the advertisement is shown: clicks ÷ impressions = CTR.)

By running two entirely identical ad campaigns via Google Ads targeting exactly the same ad words in the advertisement auction, where the only difference is the use of an official OTA domain or a vanity URL as used by the pseudopages highlighted in this paper, the experiment controlled for all other variables. The findings indicate that impressions and their availability grew significantly, suggesting **Google's algorithm favors microbrand domains opposed to the official domains of online travel agents**. This preference likely stems from the alignment of domain names with specific attractions or keywords, boosting visibility.

While acquiring traffic through microbrand sites is **more costly and converts less effectively** compared to using OTAs' official domains, the data highlight that microbrand campaigns target different Google Ads auctions, contributing to increased reach at a higher expense - and driving up prices for other advertisers in the process.

Despite these challenges, microbrand websites unlock additional impressions, showing the potential advantages in expanding reach by mimicking official sites and diverting traffic from legitimate websites to pseudopages. This puts heritage preservers and OTAs who aim at providing customers with a full-service offer at a disadvantage, by making it increasingly difficult to recoup the costs of their investment.

The key data from the mentioned experiment are visualized below, showing that microbrand advertisements consistently bring in more impressions than regular advertisements, with an even starker difference in the smaller auctions targeting fewer internet users. Four key attractions across the globe were used in this example to limit local factors such as localised ad auctions, competing pseudopages and unforeseen new competitors in bidding. These attractions in France, the UK, the US and Singapore showcase the structural problem that pseudopages play in the Google Ad market.

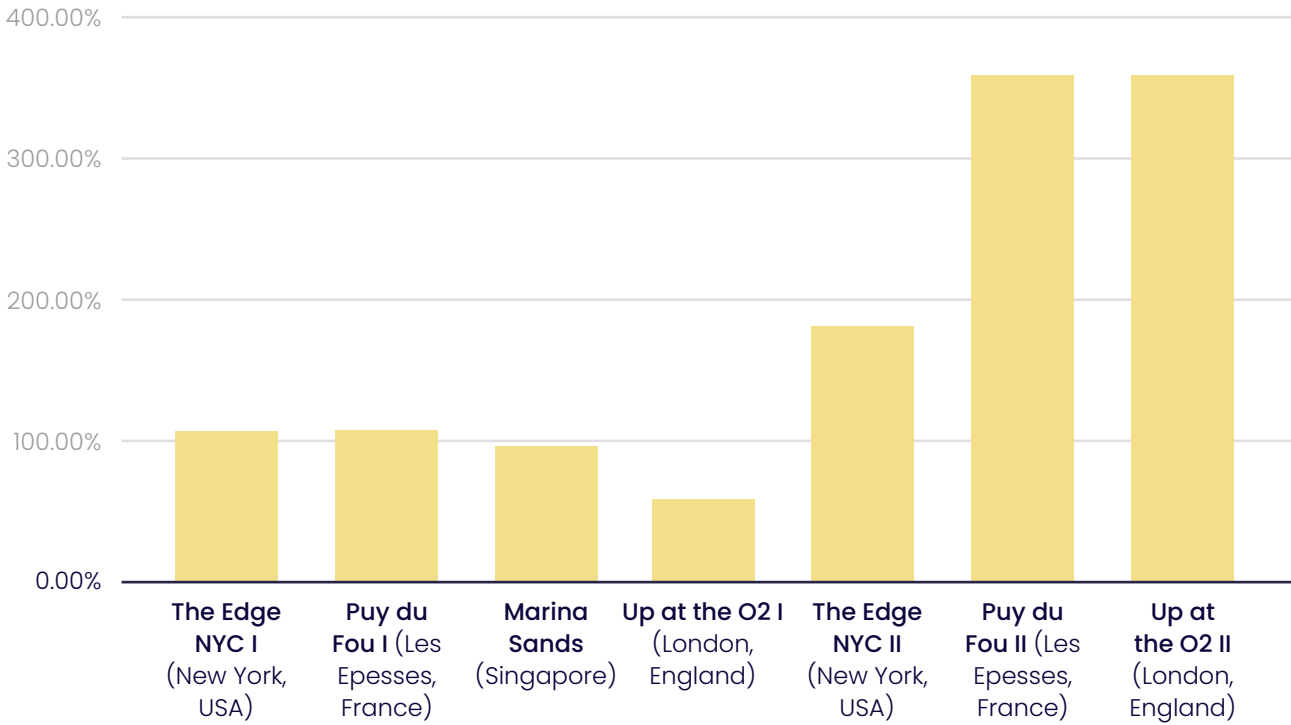


²¹ Squarespace, 2025

The Mechanics of Pseudo Pages in Tourism

Attraction	Impressions		Difference
	Base ad campaign	Microbrand experiment ads	
The Edge NYC I (New York, USA)	35,296	72,703	+105.98%
Puy du Fou I (Les Epesses, France)	8,706	18,081	+107.68%
Marina Sands (Singapore)	16,079	31,517	+96.01%
Up at the O2 I (London, England)	13,417	21,409	+59.57%
The Edge NYC II (New York, USA)	1,075	3,023	+181.21%
Puy du Fou II (Les Epesses, France)	584	2,686	+359.93%
Up at the O2 II (London, England)	744	2,549	+359.93%

Difference in Impressions
(Base Ad Campaign vs Microbrand Experiment Ads)



1. Van Gogh Museum

Netherlands

Credit Card Scams & Unauthorised “Official Reseller” listings

The Van Gogh Museum in Amsterdam is one of the world’s most visited art institutions. They are affected by pseudo pages acting as official resellers on the Google Booking Module. As Martijn Pronk, Head of Digital Communication, explains, these practices are not only damaging the museum’s reputation but also leading to direct harm for unsuspecting visitors.

The museum operates on a strict time-slot ticketing system to regulate visitor flow and preserve the quality of the visitor experience. Yet unauthorized sellers exploit this system by purchasing tickets from the official website and attempting to resell them at inflated prices. Since each ticket is time-specific, these resold tickets are often invalid or unusable—especially when the assigned time slot has already passed or is fully booked.

Moreover, the museum has identified pseudo pages and phishing sites that mimic the appearance of the official website, sometimes even offering tickets at a slight “discount” (e.g., €21.69 versus the official price of €24) to entice buyers. In reality, these sites sell invalid or fake tickets, leaving visitors disappointed and without access when they arrive.

In one alarming case, Megapass – a company that bundles and resells official tickets to the Van Gogh Museum without the museum’s authorization – was mistakenly listed as the “Official Site” by Google. This designation, shown via the Google Booking Module, took weeks to reverse despite repeated requests from the museum. Megapass listed tickets at a so-called “discount” (e.g., €21.69 versus the official €24 price), which made them rank higher in Google’s price-driven module. However, these bundled tickets often do not correspond to the correct time slots, leading to tourists being turned away at the entrance.



The fallout from these scams is profound. Tourists arrive expecting entry, only to be turned away due to capacity constraints or invalid tickets. Frustrated visitors often blame the museum, causing reputational harm and putting strain on customer service teams. In response, the Van Gogh Museum has established specific protocols to handle these situations:

- Advise visitors to purchase new official tickets (if available).
- Encourage victims to file a police report.
- Submit complaints to Google regarding fraudulent sites—though for every page taken down, many more appear.

As Martijn Pronk noted, credit card scam sites also play a role in the fraudulent ecosystem. In one instance, a cybercrime investigator from Hamburg reached out to the museum regarding a broader credit card fraud operation linked to these fake ticket platforms.

Despite taking proactive measures, the museum struggles to keep pace with the rapid reappearance of pseudo pages and unauthorised sellers. The ongoing presence of these sites on Google Search—often ranked higher than the official website—highlights the insufficient enforcement of platform policies and the urgent need for regulatory intervention.

The Van Gogh Museum’s case underscores the systemic nature of pseudo page threats in the cultural tourism sector. Beyond financial loss, these practices undermine visitor trust, damage brand reputation, and disrupt operations. It is a compelling example of why stronger oversight, better platform accountability, and targeted regulation are needed to protect both cultural institutions and their visitors in the digital space.

Photo: Pixabay.com, 2025



2. Museus e Monumentos de Portugal

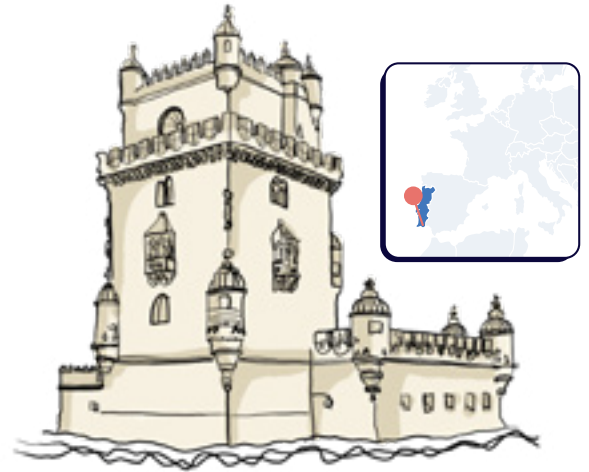
Portugal

Escalating Tension Affecting Staff Wellbeing

Museus e Monumentos de Portugal, E.P.E. has managed the country's cultural landmarks and museums since 2003. Among its most significant sites is the Jerónimos Monastery, which accounts for 51% of its total revenue. Unauthorized websites impersonating its official site and selling overpriced or even fraudulent tickets are plaguing their operations.

Despite repeated complaints to Google, these misleading pages continue to operate unchecked. A particularly damaging incident occurred when a scam website was fraudulently listed as the official ticketing site within Google's booking module. The official ticket price for the monastery is €18, yet visitors often unknowingly pay up to €35 on these fraudulent sites, harming the institution's reputation and visitor trust.

Paulo Vilhana, Coordinator of Marketing and Visitation, explains that the issue extends beyond just financial losses. Visitors frequently arrive with photo-shopped QR codes, creating tense confrontations at entry points. At Belém Tower, where long queues and high temperatures already test visitor patience, such disputes only escalate tensions. To manage these incidents, the monastery had to employ two full-time police officers to support the staff at the entrance.



Vilhana has identified companies based in India and Turkey that create these pseudo pages, and liaising with these companies directly leads nowhere. They manipulate search rankings by offering tickets below the official minimum price of €18, a practice that violates the institution's terms and conditions. These sites also use fake customer reviews to gain credibility and visibility online.

While official resellers like GetYourGuide occasionally make errors—such as mistakenly selling children's tickets instead of full-price adult ones—these are promptly corrected. The museum is actively working to strengthen relationships with legitimate OTAs and resellers to protect its visitors from scams. However, fraudulent ticketing is no longer just a peak-season issue; it is now a year-round challenge.

A clear example of the problem is seen when searching for Belém Tower tickets online. A €6 ticket option frequently appears, which is impossible given the official pricing structure. Without action from platforms like Google to regulate pseudo pages, cultural institutions like Museus e Monumentos de Portugal will continue to face unfair competition and reputational damage, while visitors remain vulnerable to scams, and staff suffer under the stress of disgruntled visitors.

3. Milan Duomo

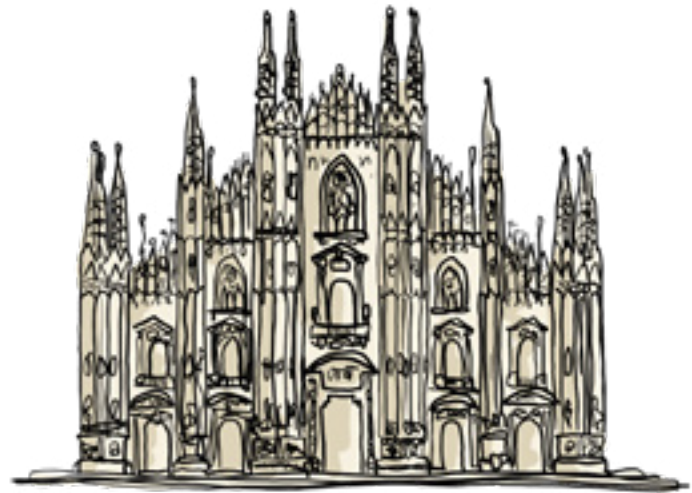
Italy

Google's Inaction

The Milan Duomo, one of Italy's most iconic cultural landmarks, attracts millions of visitors each year. As a globally recognized brand and a critical part of Italy's heritage, protecting the Duomo's reputation, ticketing integrity, and visitor trust is essential. However, Milan Duomo faces a persistent problem: unauthorized third-party websites and businesses leveraging Google's platforms to sell package tickets or resell Duomo tickets, often misleading visitors or overcharging them.

Despite Milan Duomo's efforts to flag these abusive practices, Google has been largely unresponsive to requests for takedown or enforcement against these scam pages and unauthorized resellers. This inaction has led to several issues:

- **Reputational Damage:** Visitors purchasing tickets through unauthorized channels often have negative experiences, associating those failures with the Duomo itself.
- **Loss of Control Over Visitor Experience:** The Duomo cannot manage or guarantee the quality of third-party packages that misuse its name, harming its brand.
- **Financial Loss:** Misleading sales siphon revenue away from the official channels, affecting conservation and maintenance efforts funded by ticket sales.



4. Sagrada Familia

Spain

Unauthorized Sales and Their Impact

At Sagrada Familia, one of Spain's most visited cultural landmarks, problematic websites exploit high visitor demand—especially between March and October—by impersonating the official site, inflating prices, and misleading customers.

Several categories of unauthorized sellers affect Sagrada Familia's operations. Some websites falsely present themselves as the official ticket provider, even using deceptive domains such as “.org.” Others resell tickets at significantly higher prices, undermining the monument's mission of accessibility. In some cases, agencies bulk-purchase tickets in advance, creating artificial scarcity that drives prices up even further. Visitors affected by these practices frequently face issues such as duplicate tickets or invalid entry passes. Since these third-party resellers are difficult to trace, customers often have no recourse when they need a refund due to weather disruptions, religious services, or unexpected closures. Although Sagrada Familia may reimburse the reseller, many customers never see their money returned.

Efforts to Combat the Issue

In response to these fraudulent practices, Sagrada Familia has implemented various countermeasures. They have begun mass cancellations of suspected reseller tickets, but this has led to frustration among affected visitors, as refunds remain in the hands of the reseller, not the monument itself. Technical solutions, such as IP tracking and credit card restrictions, have also been introduced, yet resellers continue to find ways around them.

Despite these efforts, regulating resale practices in a digital landscape remains complex. Google's search ranking system exacerbates the problem—Sagrada Familia does not pay for Google Ads, allowing reseller sites with paid advertisements to appear higher in search results. Websites such as **sagradafamilia.barcelonatickets.org** take advantage of ticket short-

ages, sometimes charging as much as €70–100 for tickets that officially cost €26.

Determining the full impact of fraudulent ticketing is difficult. While Sagrada Familia collects visitor feedback through post-visit surveys, most respondents report purchasing tickets through official channels. However, a growing number of visitors now recognise the price difference before their visit—some receive confirmation emails displaying the real ticket cost, leading to complaints before they even arrive at the site.

Beyond financial concerns, these practices damage Sagrada Familia's reputation. Visitors frequently leave negative reviews regarding ticket prices, often assuming that the monument itself is responsible for the inflated costs. Additionally, resellers frequently misrepresent services, such as selling audio guides that are never delivered or offering misleading time slots, which results in missed visits and further frustration. When visitors arrive with invalid tickets, Sagrada Familia provides assistance by guiding them on how to file police reports or consumer complaints. To mitigate disruptions, the monument also keeps a reserve of last-minute tickets, allowing affected visitors to repurchase entry at the official price. However, this is not a sustainable long-term solution.

For the management team at Sagrada Familia, the greatest harm caused by these reseller practices is not financial loss, but the deterioration of the visitor experience and the erosion of accessibility to the monument. As a foundation, Sagrada Familia is committed to ensuring that all visitors can experience its cultural and historical significance without falling victim to fraudulent practices.

As fraudulent ticketing continues to evolve, Sagrada Familia calls for stronger enforcement measures and industry-wide cooperation to protect both visitors and the integrity of Europe's most treasured landmarks.



5. Anonymised Contribution: Major Heritage Site in Southern Europe

The Hidden Cost of Pseudo Pages and Misleading Ticket Sales

One of Southern Europe's most iconic heritage attractions—a UNESCO World Heritage Site and among the country's most visited landmarks—is facing serious operational and reputational risks due to the proliferation of pseudo pages, unauthorised resellers, and misleading online ticket offers.

Scammers and unverified third-party sellers are dominating online search results and exploiting the visibility of booking modules on platforms like Google. This prevents many visitors from finding the official ticketing site, leading them to unknowingly purchase overpriced or invalid tickets.

Each day, particularly during high season, visitor service teams are met with angry and confused tourists who insist they've bought legitimate tickets—only to find these were issued by unofficial sellers.

Common problems include:

- Tickets that only cover a partial service (e.g., shuttle buses), mistakenly believed to include full site entry.
- Dramatic price mark-ups, with €5 tickets being sold for €25.
- Errors in time slots or even tickets for unrelated attractions in the area
- Lack of key logistical details, such as directions, access protocols, or parking options.

Staff at the site are unable to intervene directly, as there is no official relationship with these third-party sellers. Their response is often limited to:

- Recording complaints without much recourse.
- Trying to assist if possible, such as rescheduling or refunding in rare, justifiable cases.
- Advising tourists to seek refunds from the sellers—an effort that is usually unsuccessful.

The result is frequent visitor dissatisfaction, reputational damage to the institution, and emotional toll on frontline staff, who absorb most of the fallout.

One of the most severe issues involves counterfeit or duplicated tickets, where several tourists arrive with the same QR code. This forces staff to make difficult decisions about which visitor holds the genuine entry pass—often with limited time and high tensions. The site faces a dual burden: inflated resale of valid tickets lacking key information, and outright fraudulent tickets that strain operations and mislead the public.

A representative from the site's communications department stressed that this situation "harms not only consumers but also cultural heritage institutions." Without stricter platform accountability and regulatory enforcement, such scams will continue to erode public trust and undermine efforts to protect and promote cultural heritage.

Policy Recommendations

The evidence in this paper shows a clear misalignment between the structural risks posed by pseudo pages and the ability of current digital enforcement mechanisms to address them effectively. These risks fall squarely within the scope of existing digital legislation: while the DMA is well-equipped to enforce fair, reasonable and non-discriminatory access for legitimate actors in the travel experiences vertical to the Google Search Results Page, the Digital Services Act particularly addresses consumer deception, lacking platform accountability, and the need for systemic risk mitigation.

To strengthen the integrity of Europe's cultural tourism ecosystem and ensure meaningful compliance with the DSA and the DMA, we recommend the following actions:

1. Audit Google Search for Systemic Risk

Google Search must assess via targeted risk assessments and audits²² how pseudo pages exploit ranking systems. These audits should verify whether such risks are identified and what mitigation measures by Google are in place in order to protect consumers from online scams. Results should be made available to affected stakeholders.

2. Empower Cultural Institutions to Flag Pseudo Pages

Cultural organisations, including museums, heritage sites, and tourism boards, should be officially recognized by platforms as trusted flaggers²³ of harmful content, like pseudo pages. This would ensure their complaints are prioritized and acted upon quickly. In order to empower trusted flaggers further, the Commission should publish a code of conduct on Pseudo Pages to assist museums in addressing such illegal content.

3. Remove Pseudo Pages Listings

The European Commission and Digital Service Coordinators must compel Google to remove verified pseudo pages from search results. These actions are proportionate remedies under the DSA and should be logged in transparency reports to ensure traceability.²⁴

4. Escalate Enforcement if Problems Persist

Should pseudo pages remain unresolved after the previous actions were taken, the European Commission and national enforcement authorities should launch a formal investigation, with the power to impose fines, require systemic fixes, and mandate interim removal measures. Persistent failures to address these risks must result in enforceable consequences.

²² Based on DSA Article 34–35

²³ Based on DSA Article 22

²⁴ Based on DSA Article 51

Conclusion

There are few resources more precious than an individual's leisure time. When tourists are misled by fraudulent or misrepresented ticketing platforms, the consequences extend beyond financial loss.

Such experiences often result in emotional distress and the forfeiture of meaningful, anticipated encounters with cultural heritage sites. Visitors may lose the opportunity to create lasting memories with loved ones, particularly children, and to form enduring connections with new cultural contexts.

These lost opportunities undermine the broader societal value of travel as a tool for fostering intercultural understanding, empathy, and global citizenship. In this light, the proliferation of pseudo pages not only damages the reputation of Europe's cultural institutions but also represents a deeper structural threat—raising the cost and reducing the accessibility of travel, with implications for both cultural engagement and international solidarity.

Contributing authors:

European Experience Alliance, iconomy, GetYourGuide

Editorial Design

Urbanberlin Studio

Johannes Urban and Janek van Lessen

Illustrations

Janek van Lessen



**EUROPEAN
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