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THE FUTURE OF RESPONSIBLE PLAYER EXPERIENCE

Research, industry perspectives and practical lessons from the Soft2Bet Player Experience Academy



Soft2Bet Player Experience Academy
SBC Summit Lisbon | 29 September 2026

playerexperienceacademy.org

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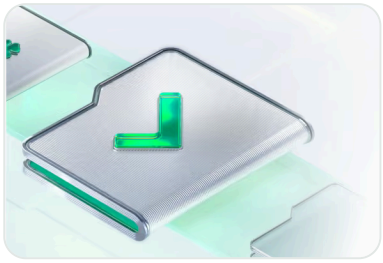
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01 EXECUTIVE OVERVIEW

SUMMARY



The online gambling industry has become increasingly sophisticated in its ability to attract, understand and engage customers. Advances in data analytics, artificial intelligence, cloud computing and behavioural design allow operators to deliver experiences tailored to individual preferences, often in real time.

Yet technological capability raises an important question: does a better understanding of the player necessarily lead to a better player experience?

Personalisation can make products more relevant and accessible. Gamification can introduce progression, achievement and social interaction into digital entertainment. Predictive analytics can help businesses anticipate changing customer behaviour. The same capabilities, however, can create risks when commercial objectives are pursued without sufficient consideration of customer wellbeing.

This tension was central to the **Soft2Bet Player Experience Academy**, held on 29 September 2026 during SBC Summit Lisbon. Bringing together technology specialists, operators, product leaders, marketing experts and risk professionals, the Academy examined the relationship between innovation, commercial performance and responsible player engagement.

Its programme combined presentations, an industry panel, a specialist session, a risk-focused case study and an interactive workshop. The format reflected an important principle: responsible player experience is not simply a matter of regulatory compliance. It also involves decisions about how gambling products are designed, marketed, managed and evaluated.

Independent research provides a substantial foundation for this discussion. Studies of gambling harm-minimisation tools suggest that personalised feedback and certain behavioural interventions can influence gambling behaviour, although their effectiveness varies considerably. Regulatory guidance increasingly expects operators to consider multiple indicators of potential harm rather than relying on isolated measurements.

The focus of this white paper is that the next stage of player experience development requires more than increasingly effective engagement technology. It requires organisations to understand when engagement is appropriate, how player protection should influence commercial decisions and who is accountable for the outcomes.

> **The challenge is to make better decisions based on knowledge, research and educational initiatives.**

The purpose of the Academy

The Soft2Bet Player Experience Academy was conceived as an educational forum bringing together different areas of industry expertise.

Its programme considered the technology supporting modern platforms, the psychology of engagement, the practical application of gamification and the risks associated with commercial decision-making.

The Academy also sought to move beyond presentation-based learning by incorporating case analysis and an interactive workshop.

This white paper considers what responsible player experience means in practice and how operators can translate principles into decisions.

Key Findings

01 **Responsible player experience must begin at the product design stage**

Responsible gambling cannot remain exclusively a compliance function. Product developers, game studios and compliance teams must collaborate from the outset to ensure that player protection, transparency and appropriate safeguards are incorporated into game mechanics, engagement features and customer journeys.

02 **Artificial intelligence offers opportunities for earlier identification of gambling harm**

Advances in behavioural analytics and machine learning can help operators identify potentially vulnerable players earlier. However, the effectiveness of these technologies depends on the quality of available data, the speed of analysis and the ability to translate findings into timely interventions.

03 **Personalisation must account for individual risk, not simply commercial value**

Traditional customer segmentation is increasingly giving way to more individualised player experiences. While this creates opportunities to improve engagement and retention, affordability, behavioural patterns and individual risk indicators must inform how operators personalise their services.

04 **Game transparency and volatility require greater industry attention**

The panel highlighted the importance of clearly communicating game mechanics, return-to-player characteristics and outcomes. Questions were also raised about whether game volatility and player preferences could provide additional behavioural risk indicators, warranting further research and more consistent measurement.

05 **Rising acquisition costs create commercial pressures that can conflict with responsible engagement**

Increasing customer acquisition and affiliate costs are strengthening the commercial case for retention. However, loyalty programmes, gamification and engagement strategies must be designed to support sustainable customer relationships rather than encourage potentially harmful participation.

06 **Individual operator compliance does not necessarily deliver industry-wide player protection**

A player restricted by one operator may continue gambling elsewhere. The discussion exposed the limitations of fragmented protection frameworks and the potential need for greater cooperation between operators, regulators and technology providers, subject to appropriate legal and data protection safeguards.

07 **Effective governance requires coordinated responsibility across the organisation**

Responsible innovation depends on aligning commercial, product, technology and compliance functions. Regulatory obligations vary between jurisdictions, but the panel reinforced the importance of consistent internal governance, proportionate interventions and transparent decision-making.

02 INDUSTRY CONTEXT

WHY PLAYER EXPERIENCE HAS BECOME A STRATEGIC PRIORITY



For much of the digital gambling industry's development, competition was defined principally by product availability, promotional incentives, pricing and convenience.

Sportsbook operators competed through betting markets, odds and live-event coverage. Online casinos expanded their libraries of games and promotional offers. Customer relationship management concentrated on acquisition, retention and reactivation.

These remain important commercial considerations. Increasingly, however, the quality of the relationship between the operator and the customer has become a strategic question in its own right.

Player experience encompasses the entire interaction between an individual and a gambling service. It begins with registration and onboarding, extends through navigation, gameplay, payments and customer support, and includes the information, safeguards and controls available throughout the relationship.

A player may encounter a technically efficient platform but still experience poor service if a withdrawal is delayed, a complaint remains unresolved or communications fail to reflect their circumstances.

Equally, an operator may offer an entertaining product while overlooking changes in behaviour that warrant closer attention.

These examples illustrate why player experience cannot be measured solely through engagement or commercial performance.

From customer engagement to customer understanding

Digital businesses increasingly use behavioural information to understand how customers interact with products.

In gambling, this information may include game preferences, session duration, deposit patterns, responses to communications and use of account-management tools.

Analytical systems can identify relationships between these variables and estimate possible future outcomes.

For example, a model may identify customers whose activity suggests that they are less likely to return. Another may detect unusual changes in gambling intensity.

The technology can identify patterns. It cannot automatically establish why an individual behaves in a particular way. A customer whose activity declines may have lost interest, changed circumstances, encountered a service problem or simply finished following a particular sporting competition.

Treating all these situations as equivalent risks producing inappropriate responses. The distinction between identifying a pattern and understanding its meaning is therefore fundamental to responsible personalisation.

Why responsibility belongs within product design

Responsible gambling has traditionally been associated with compliance obligations, self-exclusion facilities, deposit limits and customer interventions.

These mechanisms remain essential. However, player protection also depends on decisions made earlier in the product-development process.

The presentation of rewards, frequency of notifications, design of promotional journeys and use of behavioural triggers can all influence customer choices. A responsible approach considers these effects before a feature is launched, rather than treating customer protection as a corrective measure after commercial deployment.

This principle is particularly relevant to gamification, where mechanics developed in entertainment and video gaming are increasingly adapted for gambling products.

03 TECHNOLOGY

THE AWS PERSPECTIVE

Technology and the Next Generation of Player Experience



Shayan Sanyal | Global Games Industry Business Development Leader, Amazon Web Services
Academy session: Scale Fast, Know Your Player: The Technology Behind the Next Generation of iGaming

The evolution of player experience in online gambling is increasingly determined by the relationship between technological infrastructure, behavioural intelligence and organisational decision-making. As operators expand across regulated markets, the capacity to process information, respond to fluctuating demand and adapt services to individual circumstances has become central to both commercial performance and operational resilience.

At the Player Experience Academy, Shayan Sanyal, Global Games Industry Business Development Leader at Amazon Web Services (AWS), examined this relationship through a series of operational case studies, including Soft2Bet, Betsson, Spribe and Entain.

His central argument was that scalability and personalisation should not be treated as separate technological objectives. Both depend on a common foundation of reliable infrastructure, accessible data and systems capable of responding to changing conditions.

Sanyal described the challenge in terms of scale and intimacy: the ability to serve large numbers of customers while delivering experiences that remain relevant to the individual.

The distinction has important implications for the industry. Infrastructure determines whether an operator can deliver a service consistently; data and analytical capabilities influence how that service responds to customer behaviour. Neither, however, guarantees that the resulting decisions will be commercially appropriate or socially responsible.

Cloud computing and operational resilience

The operational requirements of a modern sportsbook are characterised by considerable variations in demand. Major sporting events can generate sudden increases in customer activity, placing pressure on transaction processing, account management, pricing systems and service availability.

Historically, operators have addressed these requirements by maintaining sufficient computing capacity to accommodate periods of exceptional demand. While this approach provides a degree of operational certainty, it can also result in substantial underutilisation during ordinary trading periods.

Cloud computing offers an alternative model in which computing resources can be allocated more flexibly according to demand. Its commercial significance lies not simply in reducing infrastructure expenditure but in improving the relationship between capacity, operating cost and service performance.

Sanyal illustrated this distinction through the example of Spribe's Aviator, whose rapid growth created substantial demands on its supporting infrastructure. According to his presentation, the business was serving nearly 5,000 casinos across approximately 100 countries, with active user numbers doubling repeatedly over a relatively short period.

The migration of infrastructure to AWS was presented as a means of accommodating this growth while improving the ability to manage periods of peak activity.

A second example concerned Betsson, whose international operations demonstrate the additional complexity associated with geographical expansion. Operating more than 20 brands across multiple jurisdictions, Betsson must reconcile the technical requirements of real-time betting with differences in national regulation, infrastructure and data management.

Sanyal explained that the company had developed a global network using AWS infrastructure, allowing it to position computing resources closer to customers while accommodating local regulatory requirements.

These examples demonstrate that scalability has two distinct dimensions: the ability to absorb fluctuations in demand and the capacity to reproduce a reliable operating model across markets.

From the customer's perspective, both are fundamental to player experience. An interrupted transaction, delayed account update or inaccessible betting market represents an operational failure regardless of the sophistication of the underlying technology.

Nevertheless, cloud adoption should not be regarded as an automatic guarantee of superior performance. Outcomes remain dependent on system architecture, operational management, security controls and the effectiveness of implementation.

The Soft2Bet case study: From infrastructure efficiency to organisational intelligence

The commercial implications of infrastructure modernisation were illustrated through Soft2Bet's migration to AWS.

Sanyal reported that the migration, accompanied by changes to the company's product deployment and data architecture, had delivered measurable operational improvements.

The performance indicators presented during the Academy were as follows:

−55%
Computing costs

+200%
Time to market

−70%
Partner onboarding time

~1 day
Proof-of-concept development (from weeks)

PERFORMANCE INDICATOR	REPORTED OUTCOME
Computing costs	55% reduction
Time to market	200% improvement, as described by the speaker
Partner onboarding time	70% reduction
Proof-of-concept development	Reduced from weeks to approximately one day
Data integration	New sources incorporated through configuration rather than additional hardware projects

Data analytics	Consolidated real-time or near-real-time analytical capability

***Source**: Shayan Sanyal, AWS presentation, Player Experience Academy, SBC Summit Lisbon*

The significance of these findings extends beyond the immediate reduction in operating expenditure.

Sanyal explained that Soft2Bet had previously maintained data across multiple on-premises sources, limiting the speed at which information could be consolidated and analysed.

The migration enabled the development of a more integrated data environment, described as a single source of truth for real-time or near-real-time analytics.

This reduced the technical complexity associated with introducing new data sources and accelerated the development and testing of new capabilities.

Importantly, Sanyal identified the speed of organisational learning, rather than infrastructure cost alone, as a principal constraint on performance.

His argument suggests that the strategic value of cloud adoption emerges when operational efficiency translates into improved access to information, faster experimentation and more informed decision-making.

The distinction is material. A reduction in computing expenditure constitutes an identifiable financial benefit. Faster product deployment and partner onboarding may support commercial growth. Improved data accessibility, meanwhile, creates the conditions for more sophisticated customer analysis. These outcomes are related but should not be treated as interchangeable.

In particular, improvements in operational efficiency do not establish that customers receive more appropriate recommendations, experience fewer service problems or benefit from stronger gambling safeguards. Such conclusions would require additional evidence linking technological changes to observable customer outcomes.

Development of contextual personalisation

One of the most significant distinctions advanced by Sanyal concerned the difference between customer segmentation and genuine personalisation.

Conventional segmentation assigns customers to predefined categories based on characteristics such as account history, preferred products, activity levels or commercial value.

An operator might classify customers as sports bettors, casino players, new registrants or high-value customers, subsequently delivering recommendations based on the historical behaviour of others within the same group.

Although useful for organising large customer populations, this approach does not necessarily reflect the changing circumstances of an individual.

Sanyal challenged the industry's tendency to describe such systems as fully personalised.

He argued that genuine personalisation must be **contextual, adaptive and continuous**.

Rather than relying exclusively on historical customer classifications, an advanced system should be capable of considering current session behaviour, the pace of interaction and other relevant information.

This could influence the presentation of content, the timing of communications, product recommendations or the complexity of the interface.

The underlying principle is that customer preferences and circumstances are not necessarily fixed.

A customer's behaviour during one session may differ substantially from their established historical pattern. Systems capable of incorporating new information may therefore produce more relevant assessments than those relying solely on static segmentation.

However, the ability to respond in real time also introduces additional responsibilities.

Greater precision in predicting behaviour does not establish that a particular intervention is appropriate.

An operator may understand when a customer is most likely to respond to an incentive without knowing whether presenting that incentive is consistent with the customer's interests or responsible gambling obligations.

This distinction becomes particularly important when commercial objectives and customer protection considerations are assessed within the same technological environment.

Predictive analytics and first-party data

Artificial intelligence and machine learning extend the capabilities of digital platforms by identifying statistical relationships within large volumes of information. Machine-learning models can be trained on historical observations and applied to new data to estimate the probability of particular outcomes.

In an online gambling environment, such systems may be used to assess customer preferences, identify potential disengagement, recommend relevant content or detect behavioural patterns associated with elevated risk. Sanyal emphasised the importance of first-party data and the quality of player telemetry: information generated through customers' interactions with a platform.

He described a continuous analytical process in which behavioural information informs predictive models, those models influence the customer experience, and subsequent interactions provide additional observations. This creates a feedback mechanism through which systems can be progressively refined.

The commercial potential is considerable. Better information can support more relevant customer communications, improve operational responsiveness and reduce reliance on broad assumptions about customer behaviour. Nevertheless, predictive outputs remain probabilistic rather than definitive. A model may identify a high likelihood of customer disengagement without establishing the reasons for that behaviour.

Similarly, the detection of unusual activity does not automatically establish the presence of gambling-related harm. The distinction between prediction and interpretation is therefore essential. Models should be assessed not only for statistical accuracy but also for data quality, potential bias, explainability, operational suitability and the consequences of acting on their outputs.

Integrating commercial objectives and player protection

Sanyal challenged the assumption that player engagement and player protection necessarily represent opposing technological objectives. His argument was that the analytical techniques used to understand customer preferences can also contribute to identifying potentially harmful behaviour.

Both applications may depend on behavioural data, pattern recognition and predictive modelling. He referred to AWS guidance involving Amazon SageMaker, illustrating how machine-learning infrastructure can support predictive applications.

The significance of this observation lies in the potential to develop integrated analytical capabilities rather than maintaining entirely separate systems for commercial engagement and customer protection.

However, shared technological foundations should not imply that the objectives, performance measures or decision rules of these systems are identical. Consider an operator whose predictive model identifies a customer as having a high probability of becoming inactive. A conventional commercial response might involve issuing a promotional incentive designed to encourage renewed engagement.

A more developed decision-making framework would examine additional contextual information before determining the appropriate response. The customer may have an unresolved complaint, activated account restrictions, experienced financial difficulties or displayed indicators associated with potentially harmful gambling.

In such circumstances, the appropriate action may be to resolve a service issue, provide relevant information, refer the account for review or refrain from promotional contact. The distinction is between identifying a commercially actionable pattern and determining whether commercial intervention is justified.

This requires explicit governance arrangements, including appropriate thresholds for intervention, documented decision rules, human review where necessary and mechanisms for evaluating outcomes.

> **The research implication is that predictive capability and responsible decision-making must be evaluated separately.**

A system may accurately forecast behaviour while supporting an intervention that is inappropriate, ineffective or inconsistent with player protection obligations.

The quality of the resulting decision, rather than the sophistication of the prediction alone, should therefore form part of any assessment of technological effectiveness.

Boundaries of automation

The increasing deployment of agentic artificial intelligence introduces a further dimension to the relationship between technology and organisational accountability.

Unlike conventional analytical systems, which primarily generate information or recommendations, agentic systems may be designed to undertake tasks and execute decisions with varying degrees of autonomy. Sanyal identified the boundary between automated action and human judgement as an unresolved challenge.

The critical question is which activities can safely be delegated to autonomous systems and which require direct human oversight. Routine operational tasks may offer substantial opportunities for automation, particularly where processes are repetitive, clearly defined and capable of being monitored.

Decisions involving customer vulnerability, regulatory interpretation, account restrictions or potentially harmful gambling behaviour may require stronger safeguards and explicit human accountability.

The potential economic benefits are significant. Sanyal argued that operators capable of delegating routine activities while retaining human judgement in consequential decisions could achieve substantial advantages in speed and operating cost.

The proposition is commercially persuasive, but its implementation depends on effective governance. Automation should not be assessed solely according to the volume of work transferred from employees to technological systems.

Relevant considerations include the reliability of automated decisions, the ability to identify errors, escalation procedures, auditability and the allocation of responsibility when outcomes are contested. The objective should therefore be to reduce unnecessary operational complexity without weakening accountability.

Engineering productivity

The implications of artificial intelligence extend beyond customer-facing applications.

Sanyal used Entain's technology modernisation programme to illustrate how cloud infrastructure and AI-assisted development tools may improve engineering productivity. He described the company's use of AWS managed services and development programmes, including AI-assisted tools designed to accelerate debugging and reduce the burden of maintaining complex codebases.

The strategic objective was to allow engineering teams to devote less time to infrastructure management and more time to product development. This reflects a broader change in the economics of technological experimentation. Where development previously required substantial investment before an idea could be tested, more flexible infrastructure and AI-assisted engineering may reduce the cost and time associated with experimentation.

Organisations can consequently evaluate a larger number of potential improvements, identify unsuccessful approaches earlier and allocate resources more selectively. Sanyal suggested that this ability to conduct more experiments could materially change how companies approach innovation. However, the value of increased experimentation depends on the quality of the questions being tested and the standards used to evaluate results.

A greater number of experiments does not necessarily produce better commercial or customer outcomes. For gambling operators, experimental design must also account for the possibility that an intervention may increase engagement while adversely affecting customers displaying signs of vulnerability.

Commercial performance, customer experience and player protection should therefore be assessed through appropriately differentiated measures.

Regulatory adaptability as a source of competitive advantage

International expansion creates operational complexity beyond the technical demands of scale.

Gambling regulations vary significantly between jurisdictions and may impose different requirements concerning customer verification, transaction monitoring, data management, product design and player protection.

Sanyal identified regulatory portability as an increasingly important characteristic of modern technology architecture.

His argument was that operators should develop systems capable of accommodating regulatory changes without requiring extensive redevelopment whenever a new jurisdiction is entered or an existing framework is revised.

The commercial rationale is clear. Technology that can be adapted efficiently across markets may reduce implementation costs, shorten deployment periods and improve organisational responsiveness.

Nevertheless, regulatory portability should not be confused with regulatory compliance. Flexible infrastructure may support the implementation of jurisdiction-specific controls, but the adequacy of those controls depends on legal interpretation, operational processes, governance and continuing oversight.

Adaptability creates the capacity to respond. Compliance requires that the response meets the applicable regulatory standard.

Longer-term outlook

Looking beyond immediate operational applications, Sanyal identified an emerging development in the wider video games industry: the increasing participation of players in the creation of digital experiences.

Platforms such as Roblox and Fortnite demonstrate different forms of user participation and creative involvement.

Generative AI may extend these possibilities by lowering some of the technical barriers associated with creating or adapting digital content.

Sanyal suggested that elements of this model could eventually influence betting and gaming products, allowing customers to participate more actively in shaping aspects of their experiences.

The proposition remains prospective rather than established.

Its application to regulated gambling would raise questions concerning product approval, fairness, transparency, customer protection and the boundaries of permissible personalisation.

Nevertheless, it illustrates a potentially important evolution in the relationship between technology providers, operators and customers.

The next generation of player experience may involve not only increasingly personalised products but also new forms of participation within carefully governed digital environments.

Technology as an enabler

The evidence and arguments presented by AWS support a broader conclusion: technological infrastructure has become a strategic component of player experience, rather than a separate operational function.

Scalable systems improve the capacity to maintain reliable services. Integrated data environments support faster analysis. Machine learning can identify behavioural patterns, while AI-assisted development may reduce the cost and complexity of experimentation.

The Soft2Bet case study illustrates how infrastructure modernisation can be associated with measurable improvements in operating efficiency, product deployment and data accessibility.

However, the relationship between these capabilities and customer outcomes requires careful interpretation.

Three distinctions are particularly important.

FIRST

Operational efficiency is not equivalent to customer welfare

Lower infrastructure costs and faster deployment may improve business performance without necessarily demonstrating improvements in responsible gambling outcomes.

SECOND

Predictive accuracy is not equivalent to decision quality

A technically effective model may identify behavioural patterns without establishing which intervention is appropriate.

THIRD

Automation is not equivalent to accountability

Greater operational autonomy requires clearly defined responsibilities, effective oversight and mechanisms for reviewing consequential decisions.

These distinctions are central to the development of a credible framework for evaluating responsible innovation.

Sanyal's concluding argument was that the next phase of competitive advantage would be structural rather than tactical. The decisive factors would be the adaptability of an organisation's architecture, data, operating model and regulatory capabilities, rather than the effectiveness of any individual campaign or technological initiative.

For the wider industry, this suggests that sustainable progress will depend on the ability to combine technological sophistication with sound institutional judgement.

04 PRODUCT

FROM GAMIFICATION TO EMOTIONAL ENGAGEMENT



Yoel Zuckerberg | Chief Product Officer, Soft2Bet
Player Experience Academy 2026 | SBC Summit, Lisbon
Session: Player Experience Academy 2026 Update: As It Is Now and What's Next?

The Evolution of Player Experience

The evolution of digital gambling has been characterised by successive improvements in platform functionality, product accessibility, payment technology and the sophistication of customer engagement systems. While these developments have expanded the capabilities available to operators, they have also contributed to a market in which many competing platforms offer broadly comparable products and services. Access to similar casino content, sportsbook markets, payment infrastructure and third-party technology has reduced the scope for differentiation through conventional functionality alone. The resulting strategic challenge is increasingly concerned with the quality of the customer experience: how operators establish meaningful distinctions between otherwise comparable propositions, encourage continued participation and develop commercially sustainable relationships without compromising their responsibilities towards players.

At the Player Experience Academy, Yoel Zuckerberg, Chief Product Officer at Soft2Bet, examined this challenge through the development of the company's gamification strategy. His presentation traced an evolution from the introduction of additional engagement features towards a broader philosophy of product design centred on emotional experience, familiarity and customer relationships. The underlying proposition was that the future of competitive differentiation may depend less on the quantity of functionality available to players than on the ability of operators to create experiences that customers recognise, understand and value. This represents a potentially important change in how product development is evaluated, shifting attention from the immediate performance of individual features towards their contribution to the overall customer relationship.

Zuckerberg explained that Soft2Bet's earlier approach had sought to bring together two established forms of digital entertainment: casual gaming and online casino gambling. The objective was to introduce familiar elements of recreational gaming into an environment traditionally organised around betting transactions, thereby creating additional opportunities for interaction beyond the underlying gambling activity. Over time, this approach evolved from what he described as building features for players towards designing emotions. The distinction is significant because it places greater emphasis on the psychological and experiential consequences of product design rather than treating gamification as a collection of discrete technological interventions.

From Transactional Activity to Experiential Engagement

The conventional online casino customer journey is principally transactional. A customer deposits funds, participates in gambling activities, experiences financial outcomes and may subsequently withdraw funds or return for another session. Although this model can support a commercially viable business, it provides limited differentiation where operators offer similar underlying content and functionality. It also creates an economic dependence on customer acquisition, promotional incentives and reactivation strategies, particularly in markets characterised by substantial competition and relatively low switching costs.

Zuckerberg contrasted this conventional lifecycle with a gamified model in which additional forms of participation operate alongside the underlying casino or sportsbook experience. Customers may accumulate virtual currencies, progress through complementary games, achieve milestones and receive rewards associated with their participation. The intention is to introduce a continuing sense of progression and achievement into an environment otherwise dominated by individual gambling transactions. In this model, the customer journey is no longer confined to a sequence of deposits and wagers; it includes an additional entertainment layer through which players interact with the platform and develop a sense of continuity between sessions.

The economic rationale is that a customer who perceives continuing value in the wider experience may be more inclined to return without requiring the same level of direct promotional encouragement. This is particularly relevant where customer acquisition and reactivation costs represent material components of an operator's commercial expenditure. However, the distinction between repeat participation generated by perceived entertainment value and participation encouraged through financial incentives remains important. A gamified experience may contain elements of both, and the relative contribution of each requires empirical assessment rather than assumption.

The broader strategic proposition is therefore that it changes the context in which those products are experienced. The introduction of additional entertainment mechanics can create a more differentiated customer proposition, although its commercial and social value ultimately depends on how those mechanics are designed, implemented and governed.

Familiarity and recognition

A central theme of Zuckerberg's presentation was the role of familiarity in shaping customer behaviour. He argued that successful entertainment experiences frequently draw upon recognisable cultural references, established game mechanics and emotional associations developed through earlier experiences. Board games, arcade entertainment, fantasy sports and team-building games provide examples of formats that customers may already understand and associate with enjoyment, competition or achievement. Their familiarity can reduce the effort required to understand a new product while providing a foundation for more complex forms of engagement.

This argument has relevance to established research concerning consumer behaviour, cognitive familiarity and the formation of brand associations. Familiar experiences can reduce perceived complexity and support recognition, while repeated exposure to distinctive product characteristics may strengthen recall and preference. Nevertheless, familiarity alone does not establish emotional attachment or durable customer loyalty.

These outcomes depend on a wider combination of factors, including usability, perceived fairness, personal relevance, product quality and the consistency of the customer experience over time.

Zuckerberg linked these considerations to the concepts of belonging, connection and comfort, suggesting that players may respond positively to experiences that provide recognisable forms of enjoyment beyond the immediate financial outcome of a wager. He also emphasised the importance of relatively small product distinctions in markets where competing operators frequently use the same game providers and payment methods. In such circumstances, differentiation may emerge through the cumulative effect of individual design decisions rather than through a single transformative feature.

The implication for operators is that product development should not be evaluated exclusively through technical functionality or short-term conversion metrics. The quality of the experience, the coherence of its design and the associations customers develop with the platform may also influence longer-term commercial performance. These relationships are difficult to measure directly, but their potential significance warrants greater attention within product strategy and customer research.

Translating Product Design into Commercial Outcomes

Soft2Bet's approach was illustrated through several gamification products incorporating mechanics familiar from recreational gaming. MEGA Islands introduces a complementary gaming environment in which players accumulate resources and virtual currencies, participate in competitive activities and unlock rewards. Its design draws upon recognisable board-game and social-gaming conventions, using progression and competition to create an additional layer of interaction alongside conventional casino activity.

MatchCash applies related principles by allowing customers to accumulate a form of virtual currency through qualifying activity and participate in complementary competitive games. The product illustrates how operators can introduce an additional entertainment experience without replacing the underlying casino or sportsbook proposition. In both cases, the commercial objective is to provide customers with reasons to interact with the platform beyond the immediate outcome of an individual gambling transaction.

The sports-related products described during the Academy extend these principles into formats associated with football management, competitive sports and arcade entertainment. MEGA11 allows players to build and customise virtual football teams, unlock players, develop their teams and compete through a progression-based structure. MEGA Shoot incorporates a virtual penalty-shootout format in which participants compete and receive rewards. Zuckerberg also introduced MEGA Touchdown, an American football-themed product designed around competitive progression and team development, which he described as being prepared for launch in Ontario shortly after the Academy.

These examples demonstrate the extent to which conventional boundaries between gambling products and recreational gaming mechanics are becoming less distinct at the level of customer experience. They also illustrate an important design consideration: gamification should be adapted to the cultural familiarity, sporting preferences and expectations of its intended audience rather than applied uniformly across markets.

However, the introduction of such mechanics also creates additional responsibilities. Where rewards, virtual currencies or progression systems are linked to gambling activity, operators must consider whether the resulting incentives encourage participation beyond a customer's intended limits. The distinction between ent-

ertainment value and behavioural inducement becomes particularly important when evaluating the responsible design of these systems.

Evidence of Commercial Performance

Zuckerberg presented performance figures intended to demonstrate the commercial effects of Soft2Bet's gamification strategy. He described comparative analysis involving customers exposed to different forms of product experience, including A/B testing, and reported differences in session duration, activity frequency and revenue-related measures. In one example, average session duration increased from approximately 20 minutes to 40 minutes. He also described a comparison in which one player group averaged four sessions per week while another averaged twelve. Separately, he referred to an increase in a reported activity measure from 3.3 to 14.1 per month. Although these figures indicate substantial differences in observed engagement, the available transcript does not establish the full experimental design, sample characteristics, observation periods or statistical significance of the comparisons.

The distinction is material. A/B testing can provide stronger evidence of a causal relationship between product design and customer behaviour where participants are appropriately assigned, relevant variables are controlled and the resulting differences are statistically robust. Without the supporting methodology, however, reported differences should be interpreted as company-presented performance observations rather than independently verified causal effects. Increased session duration or participation frequency may indicate stronger engagement, but neither measure independently establishes improved customer satisfaction, commercial profitability or responsible gambling outcomes.

Zuckerberg also presented figures relating specifically to MEGA11, reporting an increase of approximately 114% in daily active players, an improvement of around 18% in deposit conversion and growth of approximately 38–39% in net gaming revenue per user. These figures are commercially significant because they suggest that gamification may influence several stages of the customer relationship, including participation, conversion and revenue generation. They also indicate that product design can have measurable implications beyond conventional user-interface performance.

+114%	+18%	+38–39%
Daily active players	Deposit conversion	Net gaming revenue per user

MEGA11 — company-reported figures presented at the Academy; methodology not disclosed.

The MEGA Shoot results provided a further example. Zuckerberg reported a 13% uplift in retention, engagement by approximately 32% of the relevant player database during the World Cup period and a second-game participation rate of 71% among the customers referenced in the presentation. Taken together, these figures suggest that complementary entertainment mechanics can encourage repeated interaction and support customer retention. Nevertheless, a comprehensive assessment would require information about the underlying customer populations, the relevant comparison groups, the duration of the effects and the extent to which changes in customer behaviour were attributable to gamification rather than concurrent promotional or sporting events.

+13%	~32%	71%
Retention uplift	Of player database engaged during the World Cup	Second-game participation

MEGA Shoot — company-reported figures presented at the Academy.

These qualifications do not diminish the potential commercial significance of the reported results. They establish the evidential standards required to interpret them. For operators, investors and regulators, the relevant question is not simply whether gamification can increase measurable activity, but whether those increases translate into durable, risk-adjusted economic value and acceptable customer outcomes.

Retention and customer lifetime value

The commercial implications of gamification become particularly relevant when considered alongside the economics of customer acquisition and retention. In competitive digital gambling markets, operators may incur substantial expenditure to acquire customers and subsequently maintain their activity through promotional campaigns, loyalty incentives and customer relationship management programmes. Where customers become inactive, reactivation can require further investment without any certainty that the resulting participation will be sustained.

Zuckerberg argued that a more compelling product experience could reduce dependence on repeated promotional intervention by creating a stronger underlying relationship between the customer and the platform. Rather than relying exclusively on external communications to encourage customers to return, operators could develop experiences in which continued participation reflects the customer's interest in the product itself. This proposition shifts the economic focus from isolated engagement campaigns towards the cumulative value of product design.

From a financial perspective, the argument is consistent with a broader emphasis on customer lifetime value, although its validity depends on the relationship between incremental revenue and the costs required to generate it. Higher retention may improve customer economics where additional revenue exceeds the associated costs of rewards, product development, infrastructure, customer service and regulatory compliance. Conversely, increased activity may not translate into greater profitability where engagement incentives are expensive or where additional risk-management obligations offset the commercial benefit.

The appropriate analytical framework therefore extends beyond conventional retention and revenue indicators. Operators should examine incremental contribution margins, cohort-level customer value, promotional expenditure, retention costs and the persistence of observed behavioural changes. Particular attention should be given to whether the commercial effects remain evident after initial novelty has diminished and whether the product continues to generate value without increasingly intensive incentives.

The strategic significance of Zuckerberg's argument lies in the possibility that well-designed experiences may improve the structural economics of retention. Rather than treating customer engagement principally as a marketing expenditure, operators may increasingly regard it as an outcome of product architecture and customer experience design.

Three dimensions of sustainable player experience

Zuckerberg organised the commercial implications of Soft2Bet's approach around three dimensions: business performance, player experience and sustainability. This framework is useful because it recognises that successful product innovation must be assessed through more than one set of outcomes.

The business dimension concerns the relationship between product design and measurable commercial performance. Improvements in retention, conversion and revenue per user can contribute to operating efficiency and customer value, provided that the associated costs remain proportionate. The player dimension concerns the quality and continuity of the experience, including whether customers encounter meaningful progression, familiar entertainment formats and additional opportunities for interaction. The sustainability dimension, as presented by Zuckerberg, concerns the development of enduring customer relationships in which repeat participation arises from emotional engagement rather than continuous promotional intervention.

This third dimension requires particular analytical care. Commercial sustainability and responsible gambling sustainability are related but distinct concepts. An operator may achieve higher retention, more frequent deposits and greater revenue per user without necessarily improving customer welfare. Indeed, some of the same behavioural indicators that demonstrate commercial engagement may require additional scrutiny where they are associated with potentially harmful gambling patterns.

The presentation referred to further performance measures involving average revenue per user, net gaming revenue and a 30% increase in deposit frequency. The available transcript records figures of 45% and 65% in connection with the first two measures, but does not establish their precise definitions or whether they represent growth rates, contribution shares or another calculation. These figures should therefore remain subject to clarification before being used as formal evidence.

More fundamentally, the responsible evaluation of gamified products requires a distinction between engagement that customers find valuable and engagement that may increase exposure to financial or behavioural harm. A comprehensive assessment should therefore consider customer-set limits, affordability and risk indicators, self-exclusion behaviour, the effectiveness of protective interventions and the circumstances in which promotional or gamified incentives should be restricted.

This suggests that sustainability should be assessed through a balanced framework combining commercial performance with evidence of responsible product use. Stronger engagement may be desirable from a business perspective, but its legitimacy and long-term durability depend on the quality of the governance arrangements surrounding it.

From product features to emotional value

The most significant conceptual contribution of Zuckerberg's presentation was his distinction between gamification as a technological mechanism and emotion as the intended customer experience. Throughout the session, he returned to the importance of familiarity, recognition, belonging and the associations customers develop with entertainment products. These characteristics were presented not simply as additional feat-

ures, but as potential foundations for differentiation in a market where conventional functionality is increasingly standardised.

This perspective challenges an approach to product innovation in which technological capability becomes an end in itself. Operators may introduce increasingly sophisticated rewards systems, competitive mechanics and personalisation technologies without necessarily establishing why those features should matter to customers. A more developed approach begins with the experience the product is intended to create and subsequently determines which technologies and design mechanisms are appropriate to deliver it.

Zuckerberg concluded with a deliberately simple statement:

> **“The players, they don't want any gamification. They want an emotion.”**
>
> Yoel Zuckerberg, Chief Product Officer, Soft2Bet

The importance of this observation lies in its distinction between the instrument and the outcome. Gamification may provide the mechanisms through which customers experience progression, achievement, competition or familiarity, but the mechanisms themselves do not constitute the underlying value proposition. Their effectiveness depends on whether they contribute to experiences that customers recognise as worthwhile.

This argument also has implications for the measurement of innovation. Product development should not be judged solely by the number of features introduced, the complexity of the underlying technology or the immediate increase in customer activity. It should also be assessed according to the quality of the experience created, the durability of customer relationships and the extent to which commercial outcomes remain consistent with responsible gambling obligations.

The distinction is especially relevant as operators gain access to more sophisticated artificial intelligence, behavioural analytics and personalisation systems. These technologies may improve the ability to identify preferences and adapt digital experiences, but they do not independently determine which experiences should be created or when intervention is appropriate. Such decisions require commercial judgement, behavioural understanding and governance.

Research implications

Zuckerberg's presentation provides a commercially grounded case for examining player experience as a strategic component of operator differentiation rather than a secondary feature of digital product development. The reported performance of Soft2Bet's gamification products suggests that familiar entertainment mechanics, progression systems and complementary gaming environments may influence participation, retention and revenue generation. However, the evidence presented at the Academy should be distinguished from independently validated research, particularly where the underlying experimental methodology and customer-level outcomes have not been disclosed.

Three broader implications emerge. First, the competitive value of product innovation may increasingly depend on the integration of technological functionality with behavioural understanding and coherent experience design. Second, the economics of customer retention may be influenced by the extent to which products generate continuing value without excessive dependence on promotional expenditure. Third, the responsible deployment of engagement technologies requires operators to evaluate commercial outcomes alongside behavioural risk, customer protection and the effectiveness of governance arrangements.

These considerations establish a research agenda extending beyond the immediate performance of gamification products. Further investigation should examine the persistence of retention effects, the relationship between emotional engagement and customer lifetime value, the contribution of individual product mechanics to commercial outcomes and the effectiveness of responsible gambling safeguards within increasingly personalised environments.

The wider strategic conclusion is that the next stage of competition in digital gambling may be determined less by the availability of technology than by the quality of the experiences operators are able to create through it. Commercial success will depend not only on attracting and retaining customers, but on establishing relationships that are economically durable, operationally defensible and consistent with the responsibilities of a regulated industry.

> **Technology provides the capability, product design shapes the experience, and emotional relevance may determine whether that experience creates lasting value.**

05 PANEL DISCUSSION

DRIVING INNOVATION IN RESPONSIBLE PLAYER EXPERIENCE



> **Player Experience Academy | SBC Summit Lisbon | 29 September 2026**

The relationship between commercial growth, technological innovation and player protection was examined during the Player Experience Academy's panel discussion, Driving Innovation in Responsible Player Experience, moderated by Andrew Cochrane, Chief Commercial Officer at Soft2Bet.

The discussion brought together David Nardaia, CEO of Lambda Gaming; Francesco Postiglione, CEO of Casumo; Chris McGowan, CEO of Scatters; Justin Muscat Galán, Senior Product Manager, Player Rewards & Gamification at Betsson; and Christoffer Grönlund, CEO of Mindboogie.

Drawing on perspectives from operators, game developers, product specialists and behavioural research, the panellists explored how the industry can reconcile commercial performance with its responsibility to

protect players.

Data-driven engagement and the economics of retention

The discussion began by examining the rising cost of customer acquisition and the increasing importance of understanding player behaviour.

Christoffer Grönlund of Mindboogie discussed the opportunities presented by advanced customer data, artificial intelligence and more sophisticated acquisition strategies. His contribution highlighted how operators can use existing customer information to improve targeting and commercial efficiency.

Francesco Postiglione of Casumo examined the importance of understanding customers beyond their immediate commercial value, including the identification of potentially vulnerable players and the role of affordability assessments in responsible customer management.

The discussion established an important distinction between acquiring commercially attractive customers and developing sustainable relationships with players whose circumstances and behaviour may change over time.

Responsible innovation begins with player protection

Francesco Postiglione emphasised that responsible gambling decisions must reflect both the circumstances of individual players and the regulatory environment in which an operator operates.

He discussed the importance of affordability assessments, behavioural monitoring and risk-based intervention, recognising that operators must balance customer experience with their legal and ethical obligations.

His contribution also highlighted the limitations of traditional customer segmentation. As technology enables increasingly individualised experiences, operators have greater opportunities to respond to each player's circumstances rather than relying exclusively on broad customer categories.

Transparency and responsibility in game development

David Nardaia, CEO of Lambda Gaming, examined the responsibilities of game developers in creating products that are both engaging and transparent.

He argued that responsible gaming considerations should begin during the development process, including clear communication of game mechanics, return-to-player characteristics and the presentation of outcomes.

The discussion considered how certain features may create misleading perceptions of success, particularly when a player receives a payout that is lower than the original stake but is presented as a winning outcome.

Nardaia's contribution illustrated how responsible innovation extends beyond operator-level interventions to the underlying design and presentation of gaming products.

Understanding volatility and behavioural risk

Chris McGowan, CEO of Scatters, brought a behavioural perspective to the discussion, questioning whether the industry sufficiently understands the relationship between game volatility, player preferences and potential indicators of gambling harm.

He highlighted the importance of examining behavioural patterns rather than relying exclusively on conventional measures such as return-to-player percentages.

The exchange raised questions about whether particular gaming preferences could provide earlier indications of risk and whether existing industry tools adequately capture these differences.

McGowan also discussed the potential of artificial intelligence to accelerate research and analysis, while identifying the need for more consistent approaches to measuring and communicating game volatility.

Personalisation, gamification and responsible retention

Justin Muscat Galán of Betsson examined the use of transactional data in developing progression systems, loyalty programmes and personalised player experiences.

He explained how operators can examine customer activity, game preferences and betting behaviour when designing engagement mechanics intended to strengthen retention.

However, the discussion also demonstrated that commercial engagement and responsible player experience cannot be treated as entirely separate objectives.

The challenge is to develop experiences that remain relevant and engaging without encouraging inappropriate levels of participation or overlooking emerging indicators of harm.

Earlier intervention

Andrew Cochrane drew attention to the evolution of behavioural risk monitoring, referring to earlier work undertaken in the UK with William Hill to identify potential markers of gambling harm.

The discussion considered how artificial intelligence and machine learning could improve the identification of potentially vulnerable customers and enable operators to intervene at an earlier stage.

The panellists also examined the importance of responding to behavioural information quickly. Sophisticated analytical capabilities offer limited practical benefit if operators cannot translate their findings into timely decisions.

The wider implication is that the effectiveness of responsible gambling technology should be assessed not simply by the volume of information collected, but by its contribution to better decisions and measurable player protection.

From individual compliance to collective industry responsibility

One of the discussion's most significant themes concerned the limitations of player protection measures implemented independently by individual operators.

The panellists considered situations in which an operator identifies a vulnerable customer and restricts their activity, only for that individual potentially to continue gambling elsewhere.

This exposed a fundamental challenge: an operator may meet its immediate regulatory obligations without necessarily resolving the wider risks facing the individual player.

Francesco Postiglione discussed the practical implications of regulatory requirements, particularly in the UK, while Andrew Cochrane questioned whether the industry was doing enough collectively to protect customers.

The exchange highlighted the importance of cooperation between operators, regulators and technology providers, while recognising the complexity of developing consistent approaches across different jurisdictions.

Integrating compliance into product development

Looking ahead, Justin Muscat Galán emphasised the need for product and compliance teams to work together from the outset when designing customer journeys and introducing new features.

David Nardaia reinforced the importance of transparency and closer cooperation between game providers and operators.

Chris McGowan raised broader concerns about customer acquisition economics and the pressures that escalating affiliate costs can place on commercial decision-making.

Together, these contributions illustrated that responsible innovation cannot be achieved through technology alone. It also requires appropriate governance, commercial incentives, product design principles and organisational accountability.

Towards a more responsible player experience

The panel demonstrated that the next phase of innovation will depend increasingly on the industry's ability to combine commercial intelligence with responsible decision-making.

Artificial intelligence, behavioural analytics and personalisation provide opportunities to develop more relevant player experiences. However, their long-term value will depend on how effectively operators and technology providers use these capabilities to identify risk, improve transparency and support informed customer decisions.

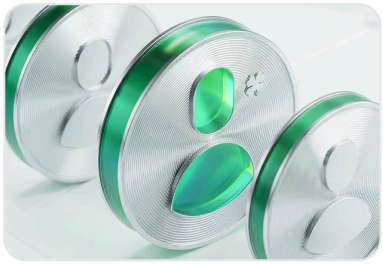
The central lesson emerging from the discussion was that responsible player experience must be embedded throughout the customer lifecycle, from acquisition and product design to engagement, intervention and

ongoing governance.

For the industry, the challenge is no longer simply to demonstrate what technology can achieve, but to establish how innovation can deliver sustainable commercial value while strengthening player protection.

06 CUSTOMER

CUSTOMER LOYALTY AND RESPONSIBLE ENGAGEMENT



Academy contributors: Arjan Korstjens, Principal and Trainer, Casino Marketing Academy, and Charles Herisson, Chief Investment Officer, Hub Affiliations
Academy session: What iGaming Can Learn from Responsible Player Experience

The relationship between customer loyalty, commercial performance and responsible engagement represents one of the central strategic challenges confronting the gambling industry. Historically, operators have relied heavily on promotional incentives, acquisition expenditure, bonus structures and customer relationship management programmes to attract and retain players. Although these mechanisms can produce measurable improvements in activity and revenue, their effectiveness does not necessarily demonstrate the quality or sustainability of the underlying customer relationship.

A player who returns because a platform is reliable, transparent and enjoyable may have a fundamentally different relationship with an operator from one whose continued participation depends on increasingly frequent financial incentives. Both behaviours may appear as retention in a commercial reporting system, yet their implications for customer welfare, long-term profitability and regulatory exposure may differ substantially.

This distinction emerged as an important theme in Arjan Korstjens' presentation at the Player Experience Academy, where he examined the relationship between customer understanding, informed decision-making and responsible product design. Drawing on examples from gambling, consumer electronics, cinema, automotive manufacturing and LEGO, Korstjens argued that the industry should reconsider how it defines the value delivered to customers. His central proposition was that responsible gambling should not be treated principally as an external regulatory obligation or a collection of mandatory disclosures. Rather, it should become an integral consideration in the development, presentation and commercial management of gambling products. The accompanying discussion with Charles Herisson extended this argument into questions of industry culture, innovation, consumer protection and the potential for alternative forms of engagement.

Redefining loyalty

Loyalty is conventionally measured through repeat purchasing, frequency of activity, customer lifetime value and the proportion of customers retained over a specified period. These indicators remain commercially relevant, but they provide an incomplete account of the relationship between an operator and its customers. In gambling, repeated participation may reflect satisfaction and trust, but it may also be influenced by promotional incentives, habitual behaviour or circumstances that require closer examination. Consequently, retention should be regarded as a measure of continued activity rather than an independent indicator of positive customer experience. A more comprehensive assessment would consider whether the relationship is transparent, whether customers understand the financial characteristics of the products they use, whether support and payment processes function reliably, and whether the operator responds appropriately when indicators of vulnerability emerge.

Korstjens' presentation challenged the assumption that greater engagement necessarily constitutes better engagement. His argument was not that customer loyalty should be abandoned as a commercial objective, but that its underlying foundations require reconsideration. A sustainable relationship should arise from a product that customers understand, an experience they value and commercial practices that do not depend on exploiting misunderstanding or financial vulnerability. In this framework, responsible engagement is not simply a constraint imposed on commercial activity. It becomes part of the conditions under which a legitimate and durable customer relationship can exist. The strategic implication is that operators should evaluate loyalty programmes according to both their commercial contribution and their potential consequences for player behaviour.

This approach also requires a distinction between customer preference and customer welfare. An individual may express a preference for particular games, levels of volatility or promotional mechanisms without necessarily understanding their financial implications. Equally, a customer may respond positively to a reward structure while experiencing an increase in expenditure that is inconsistent with their circumstances. Responsible loyalty management therefore requires operators to look beyond immediate behavioural responses and consider the broader context in which those responses occur. Commercial success and customer protection are not inherently incompatible, but neither can their alignment be assumed without evidence.

Informed choice as a foundation of responsible engagement

One of the most substantive arguments in Korstjens' presentation concerned the industry's failure to explain gambling products in sufficiently accessible terms. He illustrated the problem through an extended analogy involving a person introduced to Monopoly without being told the rules. Initially, the participant might assume that the objective is simply to move around the board. After observing other players acquiring cards and property, the participant might conclude that collecting assets is the principal purpose of the game. Only after encountering financial obligations and exhausting their resources would the underlying economic structure become apparent. The resulting frustration would arise not necessarily because the game was inherently unenjoyable, but because the player had been expected to participate without understanding its mechanics.

The analogy has direct relevance to online gambling. A customer entering a digital casino may encounter unfamiliar terminology, complex game features, multiple betting options and technical explanations of return to player (RTP), volatility, bonus structures and maximum stakes. Although this information may be available within the interface, its presence does not establish that it has been communicated effectively. Korstjens criticised the industry's tendency to present technical descriptions as though they were meaningful explanations to inexperienced customers. He contrasted this with the design of consumer electronics, using the example of a Bluetooth headset whose functionality could be communicated through a relatively simple visual guide. The lesson was that complexity should not be transferred unnecessarily from the product developer to the customer.

This distinction between disclosure and comprehension is important. Regulatory compliance may require particular information to be displayed, but meaningful consumer protection depends on whether individuals can interpret that information and apply it to their decisions. The concept of informed choice therefore extends beyond the availability of terms and conditions. It encompasses the presentation of information in accessible language, the sequencing of explanations, the visibility of financial consequences and the ability to understand the relationship between product characteristics and potential outcomes. An operator seeking to improve responsible engagement should consequently assess not only whether information has been provided, but whether customers are demonstrably better equipped to make decisions after receiving it.

Korstjens placed particular emphasis on the explanation of game volatility. He argued that players should understand whether a game is designed to produce relatively frequent smaller wins or less frequent, potentially larger payouts. His examples included a slot-game interface that allowed users to adjust a feature through a visual slider, making differences in game characteristics more immediately comprehensible. The wider principle is that product information becomes more useful when translated into an intuitive representation of the experience a customer can expect. However, simplifying volatility should not be confused with eliminating financial risk. A game with lower volatility can still produce substantial cumulative losses, while an accessible interface does not establish that a particular product is suitable for an individual customer.

Product architecture, financial exposure and the prevention of avoidable harm

The importance of informed choice becomes especially apparent when interface design influences the size of a financial commitment. Korstjens described a betting configuration in which a customer might move from a stake of approximately €0.10 to €100 through an inadvertent adjustment of the betting controls. His criticism was directed at the design of an interface that could permit a disproportionate change in exposure without sufficient clarity or protection. The issue is not merely one of consumer education; it concerns the allocation of responsibility between the customer and the product developer. Where a foreseeable interaction error can produce a materially different financial outcome, the design itself should be assessed as a potential source of risk.

This example illustrates a broader principle of responsible product architecture. Operators and suppliers should consider the consequences of default settings, stake selection, confirmation mechanisms and the presentation of maximum betting values. Appropriate safeguards may include clearer stake displays, proportionate increments, additional confirmation for unusually large changes and mechanisms that reduce the likelihood of accidental expenditure. Such measures should be evaluated through usability testing and risk

assessment rather than assumed to be effective because they appear protective. The objective is to reduce avoidable errors while preserving an appropriate degree of customer autonomy.

The distinction is commercially significant because product design affects both customer confidence and the operator's exposure to complaints, disputes and regulatory intervention. A system that enables transactions efficiently but fails to communicate their financial implications may perform well against operational metrics while generating weaknesses in consumer protection. Responsible innovation therefore requires a wider understanding of product quality, encompassing accessibility, comprehensibility, financial safeguards and the ability to identify potentially harmful patterns of use.

Customer segmentation: Commercial relevance and the limits of behavioural classification

Customer segmentation provides operators with a means of understanding differences in activity, product preference, expenditure and engagement. Conventional commercial models frequently classify customers according to transaction frequency, deposit values, lifetime revenue or the probability of responding to promotional contact. Such classifications can support operational planning and personalisation, but they do not fully explain individual circumstances. Two customers displaying similar activity may differ significantly in disposable income, financial commitments, motivations, vulnerability and their ability to sustain losses. The use of behavioural data therefore requires a distinction between predicting what a customer may do and determining what the operator should encourage that customer to do.

Korstjens proposed that responsible engagement should begin with an assessment of customers at the point of entry, supported by continued monitoring as behaviour develops. His argument was that operators should seek to understand the characteristics and potential risks associated with a player rather than treating every customer as though they present the same level of vulnerability. He also cautioned against automatically classifying ordinary gambling participation as problematic. During the presentation, he suggested that approximately 90% of gamblers do not experience gambling-related risk. This was a speaker-reported estimate and should not be adopted as an established prevalence statistic without clarification of the population, definition of risk and supporting research. Nevertheless, the underlying principle is relevant: consumer protection should be proportionate, evidence-led and responsive to changes in individual circumstances.

A more sophisticated segmentation framework would therefore combine commercial behavioural indicators with appropriate player-protection signals, while maintaining clear governance over how those indicators influence operational decisions. Customers exhibiting signs of financial difficulty, distress, loss of control or other relevant vulnerabilities should not automatically receive the same promotional treatment as customers whose activity does not raise comparable concerns. Equally, the absence of an identified risk indicator should not be interpreted as proof that no risk exists. Predictive systems operate under uncertainty, and responsible decision-making requires an understanding of their limitations, the quality of their underlying data and the consequences of incorrect classifications.

The resulting challenge is organisational as much as technological. Commercial teams may be incentivised to increase activity, while compliance and safer-gambling teams are responsible for identifying circumstances in which additional engagement may be inappropriate. A mature governance framework must reconc-

ile these objectives through clearly defined decision rights, escalation procedures, monitoring and accountability. Segmentation should support better decisions, not simply more efficient targeting.

Lessons from other industries: Competing through experience rather than incentives

Korstjens used the evolution of the cinema industry to illustrate how businesses can respond to structural competition by reconsidering the experience they provide. As home entertainment improved through widescreen televisions, surround-sound systems and subscription-based film distribution, cinemas faced increasing competition from the convenience and affordability of watching films at home. Rather than competing solely on access to content, cinema operators introduced improvements to seating, sound, visual presentation, food services and the overall environment. Korstjens cited examples including reclining seats, the ability to bring food into certain venues and in-seat ordering through digital menus. His broader argument was that cinemas increasingly competed on the experience of entertainment rather than the simple availability of a film.

The relevance to gambling lies in the distinction between the core transaction and the surrounding customer experience. Many operators offer access to broadly similar game providers, payment methods and betting markets. Differentiation may therefore depend increasingly on the quality of the interface, the reliability of transactions, the accessibility of information, the responsiveness of support and the broader experience associated with the brand. However, the analogy also has limitations. Improvements that encourage consumers to spend more time in a cinema do not present the same financial risks as mechanisms that encourage prolonged gambling. The transfer of customer-experience techniques from one sector to another must therefore be conditional on their suitability for the particular characteristics of gambling products.

A second example concerned automotive safety. Korstjens argued that manufacturers had demonstrated the potential for safety improvements to emerge from within an industry rather than exclusively through regulatory intervention. He referred to airbags, passenger protection and lane-assistance technologies as illustrations of product development motivated, at least in part, by the desire to improve safety. The historical development of these technologies involved a combination of engineering innovation, competitive pressures, public policy and regulation; consequently, the comparison should not be interpreted as evidence that automotive safety advanced independently of regulatory requirements. Its relevance to gambling is instead conceptual: product safety can become an explicit objective of innovation rather than merely a response to external enforcement.

For gambling operators and technology suppliers, this suggests that responsible design should be considered at the earliest stages of product development. Safeguards introduced only after a product has been commercialised may be more difficult to implement and may fail to address risks embedded within the original architecture. By contrast, incorporating accessibility, risk communication, behavioural monitoring and appropriate controls into product specifications can make consumer protection part of the product's operating model. This approach also creates a basis for evaluating whether innovation improves outcomes for customers, rather than simply increasing the technical capabilities available to operators.

Korstjens' third comparison concerned LEGO and the company's strategic recovery following financial difficulties in the early 2000s. He described a shift from defining the business principally through the manufacture of plastic building bricks towards an emphasis on imagination, storytelling and the creation of fictional

worlds. He cited the commercial significance of licensed themes and franchises, including Star Wars, Harry Potter and Formula 1, as examples of how the perceived value of a product can extend beyond its physical components. Although the precise financial and historical claims require independent verification, the strategic lesson is that businesses may create differentiation by understanding the emotional and experiential value customers associate with their products.

This example connects directly with Yoel Zuckerberg's Academy argument that the next generation of player experience will be shaped increasingly by familiarity, progression, achievement and emotional connection. Both presentations challenged a narrow understanding of product value based solely on transactional activity. Yet the implications for gambling must be approached carefully. Emotional engagement can strengthen customer relationships, but it can also make products more compelling in ways that increase financial exposure. The appropriate objective is therefore not simply to maximise emotional attachment, but to understand how experiential design can create value without undermining informed choice or responsible participation.

Gamification, emotional engagement and alternative sources of value

The discussion between Korstjens and Charles Herisson extended the examination of customer experience into the potential role of gamification. A central proposition was that some of the enjoyment associated with games arises from participation, achievement, progression and recognition rather than exclusively from financial rewards. The discussion referred to earlier forms of arcade entertainment in which customers could experience considerable engagement without receiving monetary winnings. This distinction raises an important question for gambling product development: whether elements of the customer experience can be designed to provide entertainment and satisfaction without requiring an equivalent increase in wagering activity.

Korstjens suggested that gamification could contribute to a more responsible product environment where certain forms of achievement and reward are available without the same direct financial exposure associated with gambling. He also acknowledged that pursuing such an approach could require reconsideration of established commercial models. His argument was that operators should not assume that sustainable growth must depend indefinitely on increasing the amount of money extracted from customers. Instead, the industry should explore whether a greater proportion of customer value can arise from entertainment, service quality and forms of engagement that are less dependent on financial risk.

This proposition is particularly relevant to the development of gamified gambling environments, but it requires careful empirical evaluation. Non-monetary rewards do not automatically make a product safer. Progression systems, virtual currencies, competitive rankings and reward schedules may encourage continued participation even when they do not themselves involve direct financial expenditure. Their effects depend on the relationship between the game mechanics and the underlying gambling activity, including whether customers must place additional bets to unlock achievements or obtain rewards. A responsible design framework should therefore distinguish between features that provide genuinely independent entertainment and those that indirectly stimulate additional wagering.

The wider strategic opportunity is to investigate whether the value proposition of gambling platforms can become less dependent on the frequency and intensity of financial transactions. This would require new

performance measures capable of distinguishing entertainment value, customer satisfaction and voluntary engagement from increased deposits, losses or time spent gambling. It would also require operators to examine whether particular forms of gamification improve customer understanding and control or merely extend the duration of activity. The commercial and social value of gamification should consequently be assessed through separate, complementary measures rather than inferred from engagement growth alone.

Responsible gambling as an organisational commitment rather than a compliance exercise

A recurring theme in Korstjens' presentation was the distinction between complying with regulation and voluntarily adopting responsible business practices. He expressed concern that the gambling industry too often responds to consumer-protection requirements only after they have been imposed by governments or regulators. In his assessment, this reactive approach risks weakening public confidence and contributing to increasingly restrictive regulatory environments. He argued that the industry should take greater ownership of product safety, consumer education and the prevention of avoidable harm, rather than treating these objectives as external obligations that compete with commercial priorities.

Korstjens also raised concerns about the unintended consequences of restrictive regulatory approaches, particularly the possibility that poorly calibrated measures may disadvantage licensed operators and create opportunities for unlicensed competitors. These comments should be understood as his assessment of regulatory dynamics rather than as an established causal conclusion. The relationship between regulation, channelisation and consumer protection varies by jurisdiction and requires market-specific evidence. Nevertheless, the underlying governance question is important: how can regulation and industry-led innovation reinforce one another while maintaining effective oversight and protecting consumers?

During the discussion, the question of investment in responsible gambling was raised in relation to an Italian regulatory requirement described as involving expenditure of approximately €1 million by major operators. Korstjens welcomed investment in responsible gambling but argued that governments, as recipients of gambling tax revenue, should also contribute to prevention, education and harm-reduction initiatives. His position reflected a broader conception of shared responsibility involving operators, suppliers, regulators and public authorities. Any reference to the Italian requirement should be verified against the relevant legislation before publication, including its precise scope, financial threshold and implementation arrangements.

Shared responsibility, however, should not dilute the obligations of individual organisations. Operators control customer relationships and many of the decisions that determine how products are marketed, configured and delivered. Suppliers influence the technical capabilities, interfaces and design features available to operators. Regulators establish and enforce minimum standards, while governments determine wider public-policy priorities. Effective consumer protection requires these responsibilities to be clearly allocated, supported by appropriate oversight and evaluated against measurable outcomes.

Vulnerability, affordability and the limits of commercial optimisation

The most consequential part of the discussion concerned customers who may be unable to sustain gambling losses and the particular vulnerability of younger adults. Korstjens argued forcefully that the industry

should not derive revenue from individuals whose financial circumstances make continued gambling unaffordable. He referred to gambling-related indebtedness among people under the age of 25 in the Netherlands and cited an approximate figure of 20,000 individuals experiencing such difficulties. This figure was presented during the session and requires verification against an authoritative source before being treated as a research finding. Its significance within the discussion was to emphasise that affordability and vulnerability should be central considerations in the design and governance of gambling products.

The issue is particularly relevant to customer segmentation and loyalty management. Customers experiencing financial difficulties may nevertheless remain commercially valuable according to conventional revenue-based metrics. A system designed primarily to maximise customer lifetime value may therefore produce recommendations that are inconsistent with responsible-gambling objectives. This creates a potential conflict between commercial optimisation and consumer protection that cannot be resolved through technical sophistication alone. It requires explicit governance rules determining when promotional activity should be limited, when customer circumstances warrant review and how financial-risk indicators should influence engagement decisions.

Affordability also illustrates the limitations of treating responsible gambling as a matter of individual choice alone. Although customers should receive clear information and appropriate tools to manage their participation, the design of products and incentives influences the decisions available to them. Operators possess information about patterns of activity that individual customers may not recognise or interpret in the same way. This asymmetry creates a responsibility to consider whether the organisation's own systems are encouraging behaviour that may be inconsistent with a customer's welfare. The objective should be to support informed autonomy while recognising that effective protection may require intervention when credible indicators of harm emerge.

Strategic implications: Measuring the quality of engagement

The combined arguments advanced by Korstjens and Herisson point towards a broader reconsideration of the metrics used to evaluate player experience. Traditional commercial indicators, including retention, activity frequency, average revenue per user and customer lifetime value, remain relevant to assessing business performance. However, none provides sufficient evidence, in isolation, that an operator is delivering a responsible or sustainable customer experience. A comprehensive framework should incorporate measures of product comprehension, customer satisfaction, complaint resolution, payment reliability, the use and effectiveness of protective tools, and the outcomes of interventions where risk indicators have been identified.

Such an approach would also require more rigorous evaluation of the relationship between product innovation and customer behaviour. For example, an increase in session duration following the introduction of a gamification feature may indicate stronger entertainment value, but it may also reflect prolonged exposure to gambling opportunities. A reduction in promotional expenditure may improve commercial efficiency, but it does not necessarily demonstrate that customers are experiencing less harm. Similarly, the introduction of clearer game information should be assessed according to whether customers understand the information and make more informed decisions, rather than merely whether the material has been displayed.

The strategic objective should therefore be to establish a multidimensional understanding of player experience in which commercial performance, customer value and responsible engagement are evaluated together. This would provide a more credible basis for assessing the long-term contribution of innovation and for demonstrating that consumer protection is embedded within the operating model. It would also encourage

closer collaboration between product development, commercial management, compliance, risk and customer-support functions.

Conclusion: From responsible-gambling commitments to demonstrable action

Korstjens and Herrison concluded their Academy contribution by challenging the industry to move beyond discussion and implement practical improvements to responsible player experience. His closing message was that helping customers make informed choices should not be regarded as an exceptionally complex ambition, but as an essential responsibility that operators must translate into product design and operational practice. The discussion with Herisson reinforced the importance of considering lessons from other sectors, while recognising that gambling requires additional safeguards because its products involve financial risk.

The broader conclusion is that the next stage of customer loyalty in gambling should not be defined solely by the ability to retain customers for longer or increase the frequency of their transactions. It should be judged by the quality of the relationship established, the transparency of the product, the suitability of engagement mechanisms and the organisation's ability to recognise and respond to potential harm. Sustainable loyalty requires trust, and trust depends on customers having reasonable confidence that the operator's commercial interests do not consistently override their welfare.

For the gambling industry, the opportunity is to develop a more sophisticated model of value creation in which entertainment, technological innovation and responsible engagement reinforce one another. Achieving this will require a shift from measuring customer behaviour exclusively as a source of revenue towards understanding it as evidence of a relationship that carries both commercial opportunities and obligations. The central challenge is not whether operators can make gambling products more engaging. It is whether they can demonstrate that the engagement they create is informed, proportionate and consistent with a sustainable customer relationship.

RESEARCH CONCLUSION

Customer retention and responsible engagement are related but distinct dimensions of player experience. The evidence presented at the Academy supports the need for an integrated framework that evaluates commercial outcomes alongside customer understanding, financial safeguards and indicators of potential harm. Improvements in engagement should not be interpreted as evidence of improved player welfare without appropriate supporting data.

07 RISK & GOVERNANCE

MANAGING RISK FOR COMMERCIAL SUSTAINABILITY

The case for integrating player protection into business strategy



Dr Colin Lawrence, Former Senior Regulator and Risk Specialist
In conversation with Martyn Elliott, SBC Media Director
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Responsible player experience is frequently presented as an ethical obligation or a matter of regulatory compliance. However, as Dr Colin Lawrence argued during the Player Experience Academy, it is also a fundamental question of organisational risk, commercial sustainability and corporate governance. A gambling business may develop highly effective engagement systems, increase customer retention and improve short-term profitability while simultaneously creating risks that threaten its longer-term commercial position. These risks may emerge through changing customer behaviour, inadequate product oversight, failures in operational controls or regulatory intervention. The challenge for operators is therefore not simply to demonstrate that their products comply with existing technical standards, but to establish that the systems influencing customer behaviour remain subject to effective supervision throughout their operational lives.

In conversation with Martyn Elliott, Lawrence drew extensively on his experience in banking and financial regulation to examine the implications of increasingly sophisticated gambling technology. His contribution placed particular emphasis on the relationship between innovation and control, arguing that the introduction of artificial intelligence, personalised customer journeys and gamification mechanics requires a corresponding evolution in governance. The financial sector, he suggested, offers relevant lessons because its approach to risk management has progressively expanded beyond the technical characteristics of individual products to consider how customers, institutions and interconnected systems behave under different circumstances. The gambling industry faces a comparable challenge as the commercial opportunities created by technological innovation become more complex and potentially difficult to supervise.

The central argument emerging from the discussion was that responsible innovation cannot be separated from the governance structures supporting it. Technical fairness remains essential, but it does not necessarily establish whether a product's wider behavioural consequences are appropriate. Operators must be able to demonstrate that they understand how their engagement mechanisms work, how different groups of customers respond to them and what action can be taken when outcomes diverge from expectations. This requires a shift from treating compliance as a final stage of product approval towards integrating risk management into the design, deployment and continuous supervision of player experiences.

Four dimensions of risk

The governance framework discussed by Lawrence can be understood through four interconnected dimensions of organisational risk: behavioural, regulatory, operational and reputational. Although these categories provide a useful structure for analysis, their significance lies in the relationships between them. A weakness in one area may create consequences across several others, particularly where automated systems influence customer activity at scale. A promotional mechanism that increases engagement, for example, may initially appear commercially successful, but if it fails to recognise signs of potentially harmful behaviour, the consequences may extend beyond the individual customer to regulatory scrutiny, operational remediation and reputational damage.

BEHAVIOURAL RISK

concerns the possibility that gambling products, engagement mechanics, promotional incentives or customer interactions contribute to patterns of activity associated with harm. These risks may arise through the cumulative effects of progression systems, rewards, personalised offers or other mechanisms designed to encourage continued participation. The relevant question is not whether such features are inherently inappropriate, but whether their effects are understood and monitored sufficiently to identify when particular customers may require additional safeguards. As Lawrence emphasised, operators must examine what happens after products are introduced, rather than assuming that initial testing provides an adequate understanding of their long-term consequences.

REGULATORY RISK

arises when business practices fail to satisfy applicable laws, licence conditions or supervisory expectations. Lawrence's discussion suggested that the scope of regulatory concern may need to extend beyond conventional assessments of technical fairness towards the governance of behavioural outcomes. This does not mean that existing requirements concerning randomness, game certification or return-to-player calculations become less important. Rather, these established controls form part of a wider framework in which operators must also demonstrate appropriate oversight of the systems influencing customer behaviour.

OPERATIONAL RISK

encompasses failures in technology, processes, organisational responsibilities and internal controls. These risks become particularly significant when businesses introduce increasingly complex systems involving artificial intelligence, third-party technology and individually personalised customer journeys. An organisation may have sophisticated technical capabilities without possessing equally sophisticated mechanisms for understanding or supervising their consequences. Lawrence repeatedly returned to the importance of clearly assigned responsibilities, independent validation and documented procedures capable of identifying weaknesses before they develop into more serious problems.

REPUTATIONAL RISK

concerns the potential loss of confidence among customers, regulators, investors, commercial partners and the wider public. Although reputational consequences may follow regulatory failures, they can also arise from broader concerns about how a business treats its customers or manages emerging technologies. For licensed operators, the ability to demonstrate effective governance can therefore support commercial credibility. Lawrence's argument was that responsible control should not be regarded solely as a cost imposed by regulation, but as part of the infrastructure supporting a sustainable business.

From technical fairness to behavioural governance

One of the most significant themes of Lawrence's presentation was the distinction between technical fairness and behavioural governance. Traditional gambling controls have focused heavily on the mathematical and technical characteristics of games, including randomness, return-to-player calculations, independent testing and certification against established standards. These measures are fundamental to ensuring that products operate according to their specifications. However, Lawrence argued that they do not necessarily address the full range of risks introduced by contemporary engagement systems, particularly where the customer experience extends beyond the underlying wager.

Modern gambling products increasingly incorporate progression mechanisms, missions, streaks, battle passes, VIP programmes and personalised rewards. These features can influence how frequently customers return, how they respond to incentives and how their participation develops over time. A game may satisfy the applicable technical requirements while the surrounding engagement system produces behavioural outcomes that require closer scrutiny. Lawrence therefore questioned whether validating the mathematical fairness of a game at launch provides sufficient assurance about the broader experience created by the combination of product mechanics, promotional systems and customer behaviour.

Drawing on the evolution of financial regulation, Lawrence suggested that the industry must become more attentive to the behaviour generated by its systems. He referred to the financial crises of 1929 and 2008 to illustrate the importance of understanding how apparently established financial arrangements can become vulnerable when the behaviour of participants changes. These historical comparisons were used to support his broader argument about the limitations of examining products in isolation, rather than as a detailed causal analysis of either crisis. His point was that technical controls alone may fail to capture the risks created by the interaction between people, incentives and complex systems.

For gambling operators, the implication is that governance must consider the behavioural effects of engagement mechanics throughout their lifecycle. This includes understanding the assumptions underlying product design, testing those assumptions before deployment and examining whether actual customer behaviour remains consistent with expectations once the product is live. The transition is not from technical fairness to behavioural governance as an alternative, but towards a more comprehensive framework incorporating both.

Governance as a commercial responsibility

During the discussion, Martyn Elliott raised the industry's recurring concern that compliance requirements can restrict commercial opportunities, particularly when licensed operators compete against businesses operating outside equivalent regulatory frameworks. He referred to the perception that compliance can limit the development of attractive products, constrain acquisition channels and prevent licensed businesses from pursuing activities available to unlicensed competitors. The question was whether operators should reconsider compliance as something more valuable than an administrative burden or a condition of retaining their licences.

Lawrence agreed that effective governance could provide a competitive and strategic advantage. His argument was that organisations capable of demonstrating control over their products and operations are better positioned to manage uncertainty and maintain sustainable commercial activity. Rather than treating compliance as a separate function that intervenes after commercial decisions have been made, businesses should integrate risk management into the processes through which products are conceived, developed and operated. This would allow potential problems to be identified earlier and reduce the likelihood that organisations must subsequently undertake expensive remediation or respond to regulatory concerns.

A central element of this approach is the allocation of responsibility throughout the organisation. Lawrence cautioned against relying on a small risk, compliance or audit department operating in isolation from the rest of the business. Such an arrangement may create the impression that governance is the responsibility of a specialist team rather than an obligation shared across operational functions. Product designers, commercial managers, technology specialists and senior executives must understand how their decisions affect the organisation's wider risk position. Compliance and risk functions should provide independent challenge and oversight, but they cannot substitute for accountability within the teams creating and operating the relevant systems.

Lawrence placed particular emphasis on what he described as the governance of behaviours. This requires organisations to establish a culture in which risk is considered alongside commercial performance, with clearly defined ownership and escalation procedures. The objective is not to prevent innovation, but to ensure that commercial development takes place within a framework capable of identifying, understanding and managing its consequences. For a technology-driven gambling business, such governance becomes increasingly important as the number and complexity of engagement mechanisms expand.

Identifying potential harm through behavioural indicators

The identification of potentially harmful gambling requires operators to examine multiple dimensions of customer activity rather than relying on individual measures. The UK Gambling Commission's customer-interaction guidance for remote operators identifies seven minimum categories of indicators: customer spend, patterns of spend, time spent gambling, gambling behaviour, customer-led contact, use of gambling-management tools and account indicators. These categories illustrate the importance of examining customer behaviour in context, recognising that a single change in expenditure or participation may have different implications depending on the circumstances.

Lawrence approached the issue through the concept of behavioural patterns and customer groupings. He distinguished between customers whose gambling activity remains relatively stable and recreational and those whose participation may become more episodic, intensive or event-driven. The significance of this distinction is not that every customer can be assigned permanently to a particular category, but that changes in behaviour may provide important information about emerging risk. An individual who previously participated at relatively modest and consistent levels may begin placing substantially larger wagers, responding more frequently to promotional incentives or demonstrating other changes requiring assessment.

The comparison with banking was particularly relevant. Lawrence referred to the way financial institutions examine customer behaviour and liquidity patterns, noting that risk management increasingly depends on understanding what people are likely to do under changing circumstances. He used the example of deposit behaviour and the possibility of sudden withdrawals to illustrate why the characteristics of a financial product alone cannot provide a complete understanding of the risks associated with it. In gambling, a comparable approach would involve monitoring how customers respond to products and incentives, rather than examining engagement figures exclusively as indicators of commercial success.

Behavioural indicators should nevertheless be interpreted carefully. A change in activity does not automatically establish that a customer is experiencing harm, and predictive systems may generate both false positives and false negatives. Responsible monitoring therefore requires appropriate contextual assessment, clear escalation criteria and proportionate responses. The purpose of behavioural analysis is not simply to classify customers, but to support better decisions about when continued engagement is appropriate and when additional protective measures may be necessary.

Retention, commercial incentives and customer protection

Customer retention was repeatedly identified during the Academy as a central commercial objective. Lawrence acknowledged that retaining customers is fundamental to the economics of gambling, but questioned whether the industry sufficiently considers the circumstances in which increased retention may produce undesirable outcomes. Commercial strategies frequently seek to strengthen customer loyalty, encourage repeat participation and improve the effectiveness of promotional investment. These objectives may be legitimate, but their success cannot be evaluated independently of the behaviour they generate or the potential risks to individual customers.

Lawrence's concern was particularly relevant to engagement systems designed to encourage progression or continued participation. Missions, streaks, rewards and other gamification mechanisms may increase the frequency with which customers return to a platform. However, the effects of these systems are unlikely to be identical across all customers. A mechanism that contributes to an enjoyable recreational experience for one individual may encourage more intensive participation by another. The governance challenge is therefore to understand how different customers respond and to ensure that commercial incentives do not override indications that continued engagement may be inappropriate.

He argued that operators must examine the relationship between retention and customer welfare before problems become apparent. Where behavioural indicators suggest heightened risk, the organisation should be capable of reviewing promotional activity and taking proportionate action. This may involve reducing the intensity of incentives, initiating customer interactions or applying other measures consistent with applicable regulatory requirements. The important principle is that an increase in engagement should not automatically be regarded as a positive outcome without consideration of the circumstances in which it occurs.

The commercial implications extend beyond immediate customer-protection obligations. A retention strategy that produces short-term revenue while increasing exposure to regulatory intervention or customer harm may undermine longer-term business sustainability. Lawrence's argument therefore challenges the assumption that commercial performance and responsible gambling can be assessed through separate organisational processes. Sustainable retention requires a broader understanding of customer value, incorporating the risks associated with the methods used to achieve it.

Personalised customer journeys

Artificial intelligence introduces additional complexity because it enables operators to create increasingly individualised experiences. As Lawrence explained, different customers may receive different rewards, progress through different engagement mechanisms or respond to personalised incentives generated by automated systems. The resulting environment is substantially more difficult to supervise than one in which all customers encounter the same standardised product. The challenge becomes particularly significant when AI models adapt over time, creating outcomes that may differ from those anticipated during initial development.

Lawrence questioned how organisations could maintain effective oversight when the number of potential customer journeys becomes extremely large. It is not practical to assign a separate individual to supervise every personalised experience, yet the organisation remains responsible for the systems it deploys. His proposed response was to develop meaningful behavioural groupings, understand how different categories of customers interact with products and establish monitoring processes capable of identifying changes that may require attention. This would allow operators to examine patterns across customer populations while retaining the ability to investigate individual circumstances when necessary.

The discussion also addressed the limitations of relying exclusively on automated decision-making. Lawrence raised concerns about the behaviour of advanced AI systems and the need for effective human control, referring to reported experiments involving AI models as an illustration of the broader governance challenge. Such examples should not be interpreted as evidence that gambling AI systems behave in the same way. His underlying argument was that organisations cannot assume that sophisticated technology will necessarily operate in accordance with their intentions without appropriate supervision, validation and intervention mechanisms.

Human accountability was therefore central to his proposed governance approach. Businesses must be able to identify who is responsible for an automated system, who can challenge its operation and who has the authority to suspend or modify it when necessary. This authority must be supported by documented procedures and operational capability. An organisation cannot demonstrate meaningful control merely by stating that human oversight exists; it must be able to show how that oversight operates in practice.

Continuous validation and independent oversight

A recurring criticism in Lawrence's presentation concerned the tendency to treat product validation as a one-off exercise. He argued that an engagement mechanism may be tested before launch, introduced into a live environment and subsequently remain in operation without sufficient reassessment of its behavioural consequences. Such an approach becomes increasingly problematic where products are updated, customer

behaviour changes or automated systems adapt over time. Initial certification may establish that a mechanism meets specified requirements at a particular moment, but it cannot necessarily demonstrate that its effects will remain appropriate indefinitely.

Lawrence advocated maintaining an inventory of engagement mechanisms, with each component linked to clearly documented assumptions, identified risks and responsible owners. Before deployment, organisations should examine how a mechanism is expected to influence customer behaviour and establish methods for assessing whether those expectations are realised. Once the product is live, the same assumptions should be revisited using evidence from actual customer interactions. Where outcomes differ materially from expectations, the organisation should investigate the reasons and determine whether adjustments or additional safeguards are required.

Independent validation was another important element of his argument. Commercial teams may be strongly incentivised to maximise participation and revenue, making independent scrutiny essential to effective governance. Lawrence referred to the three lines of defence familiar from financial services risk management. Under this model, operational teams retain responsibility for the risks associated with their activities, independent risk and compliance functions provide oversight and challenge, and internal audit offers additional assurance. The precise structure adopted by a gambling business may differ, but the underlying principle is that risk management requires both operational ownership and sufficiently independent examination.

The need for continuous validation also applies to artificial intelligence. Predictive models may perform differently as customer populations, products or market conditions change. Systems that initially appear effective may become less reliable or produce unintended consequences. Responsible deployment therefore requires monitoring, reassessment and clearly defined procedures for responding when performance or behavioural outcomes depart from acceptable parameters.

Embedding governance from the beginning

Elliott questioned whether incorporating governance at the beginning of product development could ultimately reduce the time and resources required to manage compliance. The question reflected a broader commercial concern: whether risk management should be understood primarily as an additional cost or as a means of improving the efficiency and reliability of business operations.

Lawrence supported the principle of integrating controls from inception but suggested that commercial pressures frequently prevent organisations from doing so. When profit margins tighten, businesses may prioritise faster development, increased retention and immediate revenue opportunities. Under these conditions, governance can be perceived as an obstacle to progress rather than a necessary component of responsible innovation. The result may be that products are introduced before their behavioural consequences have been adequately examined or before effective oversight arrangements are established.

He illustrated the problem through an analogy with a vehicle equipped with sophisticated features but lacking essential safety mechanisms. The point was that innovation without appropriate control can create vulnerabilities that become apparent only after the system is operating. In a gambling environment, such weaknesses may involve inadequate monitoring of customer behaviour, insufficient validation of engagement mechanics or unclear responsibility for intervention.

Introducing governance after deployment may require organisations to redesign products, investigate unexpected outcomes or implement corrective measures under regulatory or commercial pressure. By contrast, establishing appropriate controls during development can help identify potential weaknesses earlier. Lawrence did not present quantified evidence that this approach necessarily reduces costs in every case, but his argument was that effective governance should be designed into operational processes rather than added retrospectively.

Risk-based intervention and organisational accountability

Lawrence emphasised that effective governance must include the ability to intervene when customer behaviour indicates a potential problem. Monitoring systems are of limited value if organisations lack clear procedures for acting on the information they produce. The relevant responsibility extends beyond detecting changes in activity to determining what those changes mean, who should assess them and what action may be required.

He illustrated this principle through an analogy with the hospitality industry. A person operating a bar must recognise when continued service may create risks and decide when intervention is appropriate. Waiting until a serious incident occurs would represent a failure to manage a foreseeable problem. Lawrence used this example to demonstrate why gambling operators should establish behavioural controls and intervention procedures before potentially harmful outcomes arise, rather than relying exclusively on responses after the event.

In practice, a risk-based approach requires proportionate action informed by the available evidence and applicable regulatory requirements. Not every behavioural change warrants the same response, and not every increase in gambling activity indicates harm. However, where relevant indicators emerge, operators should be able to assess them, document decisions and implement appropriate measures. These may include customer contact, changes to promotional eligibility, account restrictions or further specialist review.

The accountability arrangements surrounding intervention are particularly important when automated systems are involved. Lawrence argued that responsibility must remain with identifiable individuals and organisational functions rather than being attributed to technology itself. Operators should be able to demonstrate who owns a particular mechanism, who is responsible for assessing its effects and who can authorise intervention. These responsibilities must be sufficiently clear to function in practice, particularly when commercial considerations and customer-protection concerns point towards different courses of action.

A governance framework for sustainable innovation

Lawrence's presentation brought together several requirements that could form the basis of a more comprehensive governance framework for modern gambling products. The first is the establishment of an inventory covering relevant products, engagement mechanics and associated behavioural risks. This provides a foundation for understanding what systems are operating, how they interact and where responsibility lies. Without such an inventory, organisations may struggle to identify the full range of mechanisms influencing customer behaviour, particularly when multiple products and third-party technologies are involved.

The second requirement is clearly defined ownership. Every significant engagement mechanism should have an identifiable person or function responsible for its operation and associated risks. Lawrence stressed that

ownership cannot be limited to achieving commercial performance targets. It must also encompass responsibility for understanding the mechanism's behavioural consequences and ensuring that appropriate controls remain effective. This responsibility should be supported by independent challenge, enabling risk and compliance specialists to question assumptions and assess whether commercial decisions remain consistent with the organisation's obligations.

Continuous monitoring and validation form the third component. Operators must be able to examine whether products are producing the outcomes anticipated during development and identify changes that may indicate emerging risks. This requires suitable information, documented assessment procedures and the ability to distinguish ordinary variations in customer behaviour from patterns requiring closer examination. Where risks are identified, the organisation must possess effective intervention capabilities and clear escalation arrangements.

Finally, Lawrence placed responsibility at the level of senior management and the board. Governance cannot be considered effective if accountability is fragmented or confined to specialist teams without sufficient authority. Senior leadership must understand the organisation's approach to behavioural risk and ensure that commercial incentives do not undermine the controls intended to manage it. The objective is to establish a framework in which innovation can proceed with appropriate oversight, supported by evidence that the business understands and supervises the consequences of its products.

Commercial sustainability through responsible governance

The discussion between Lawrence and Elliott highlighted a fundamental tension in modern gambling: the same technologies that create opportunities for stronger engagement and commercial growth can also increase the complexity of managing customer risk. Artificial intelligence, personalised rewards and increasingly sophisticated gamification mechanisms provide operators with greater opportunities to influence customer experiences. However, these capabilities also place greater demands on governance, particularly where individual customer journeys become more varied and difficult to supervise.

Lawrence's contribution suggested that the industry must move beyond a narrow understanding of compliance as adherence to technical standards or completion of prescribed procedures. Effective governance requires organisations to understand how their products influence behaviour, how those effects change over time and how responsibility is allocated when intervention becomes necessary. The ability to demonstrate such control may become increasingly important as regulatory expectations evolve and businesses deploy more sophisticated technologies.

This approach does not eliminate the commercial pressures facing licensed operators, nor does it guarantee that harmful outcomes can always be prevented. It does, however, provide a more disciplined framework for balancing innovation with responsibility. Businesses that incorporate behavioural risk assessment into product development, maintain independent validation and establish clear accountability are better equipped to identify emerging problems and respond before they become more serious.

For technology providers, the implications are equally significant. Platforms and engagement systems should support the information, monitoring and intervention capabilities that operators require to fulfil their responsibilities. Responsible innovation therefore depends not only on the design of individual products but also on the wider infrastructure through which those products are deployed and supervised.

The central conclusion of Lawrence's presentation was that the future of gambling governance cannot rest exclusively on demonstrating that games are technically fair. As products become more personalised and adaptive, operators must also be able to demonstrate effective control over the behavioural systems influencing customer participation.

> **Commercial sustainability ultimately requires innovation and governance to develop together. The measure of responsible progress is not simply what technology enables a business to achieve, but whether the organisation can understand, supervise and account for the consequences of deploying it.**

08 TAKEAWAYS

LESSONS LEARNT

The panel highlighted several practical lessons for operators, technology providers and the wider iGaming industry.

01

Embed responsibility from the outset

Player protection should be integrated into product development, game mechanics and customer journeys, rather than introduced retrospectively to satisfy compliance requirements.

02

Use behavioural intelligence to anticipate risk

Artificial intelligence and data analytics can support earlier identification of potentially harmful behaviour, but their value depends on timely, proportionate and effective intervention.

03

Personalise responsibly

Players should not be treated as a homogeneous customer base. Engagement strategies must reflect individual preferences, affordability, behavioural patterns and potential vulnerabilities.

04

Make transparency a design principle

Game mechanics, volatility, return-to-player information and the presentation of winnings should be communicated clearly to support informed player decisions.

05

Balance retention with player wellbeing

Rising acquisition costs strengthen the commercial importance of retention, but loyalty programmes and gamification must not incentivise excessive or harmful participation.

06

Strengthen industry-wide cooperation

Restricting a vulnerable player at one operator does not necessarily prevent continued gambling elsewhere. Greater collaboration is needed to address the limitations of fragmented protection frameworks.

07

Align commercial, product and compliance teams

Responsible innovation requires shared accountability, with governance and risk considerations informing decisions throughout the product lifecycle.

08

Measure outcomes, not technological capabilities

The success of responsible innovation should be judged by demonstrable improvements in player protection and sustainable commercial performance, rather than the sophistication of the technology deployed.

Concluding Lesson

The future of player experience lies not in understanding when, how and whether engagement is appropriate for each player. Sustainable innovation requires commercial objectives, responsible product design and player protection to operate together.

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ABOUT

THE PLAYER EXPERIENCE ACADEMY

The Player Experience Academy is an educational initiative developed by Soft2Bet to advance industry discussion and practical understanding of player engagement, product innovation and responsible gambling.

Through expert presentations, industry dialogue, case studies and collaborative learning, the Academy brings together commercial, technical and regulatory perspectives on the future of player experience.

Its purpose is to encourage informed decision-making and support the development of customer experiences that combine innovation with responsibility.

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