Jdigital

Illegal Online Gambling in Spain

2025 Report

Index

Jdigital | EY

1

Executive summary

23.4% of respondents indicate that they would use illegal gambling platforms

CONTEXT

Online gambling is a well-established sector in Spain, regulated by the DGOJ since 2012 under a framework designed to safeguard player security and market integrity. However, in recent years an unregulated market has grown significantly, driven by websites, social media and messaging applications.

When analysing responses related to the use of unauthorised domains, platforms and channels, it is observed that up to **23.4%** of the sample **would gamble in unregulated environments**. In addition, 9.3% explicitly state that they use unlicensed platforms. The expansion of new acquisition channels, such as **Telegram and social media**, facilitates access and offers more aggressive incentives with fewer restrictions.

This figure is derived from the combined responses of users who report using inherently illegal gambling platforms and those who play on websites outside safe environments (e.g., .com, .io, .bet, etc.). It should be noted that these results come from a sample of users who play and/or have played on legal platforms; therefore, the real figure could reasonably be assumed to be higher.

How have you placed real-money bets over the past 12 months? And what domains do the websites you have used most frequently have?

23,4%

640 responses

Based on the combined share of respondents who report using platforms outside safe environments and/or indicate that they have used unregulated domains (.com, .io, .bet, etc.).

OBJECTIVE

The survey and analysis aims to provide evidence on the current state of unregulated online gambling in Spain, identifying the factors driving its growth and the profiles most exposed to it. In addition, the study seeks to contribute to the institutional and European debate on the need to strengthen cooperation and maintain a balanced regulatory framework, ensuring consumer protection without undermining the competitiveness of the legal market.

Source: Jdigital Survey

Lack of awareness around illegal gambling is evident: 47.5% of those who believe they gamble on legal domains are in fact using unauthorized websites

According to the EGBA (European Gaming and Betting Association), in the case of France in 2023, **the ban on online casinos led illegal gambling to reach almost 50% of the regulated market's volume**. This illustrates how strict limitations, combined with high levels of unmet demand, push users towards foreign operators outside state control.

In Spain, a similar phenomenon can be observed. The use of domains other than ".es" (.com, .org, .bet, etc.) has become widespread among players, and one in every two respondents acknowledges having used them at least once.

Moreover, **47.5%** of respondents who claim to gamble exclusively with legal operators also reported accessing domains other than ".es". This reflects a significant lack of awareness regarding which platforms are authorized. This behaviour, driven both by the search for greater flexibility and by insufficient information, leaves many users outside the protection and supervision framework provided by the regulated market.

In fact, many users who use non-"es" domains are respondents who initially stated that they gamble exclusively with legal operators. When these users are combined with those who openly declare gambling with illegal operators and who also use non-"es" domains, the result is that **48.6%** of all respondents are effectively operating within the unregulated market.

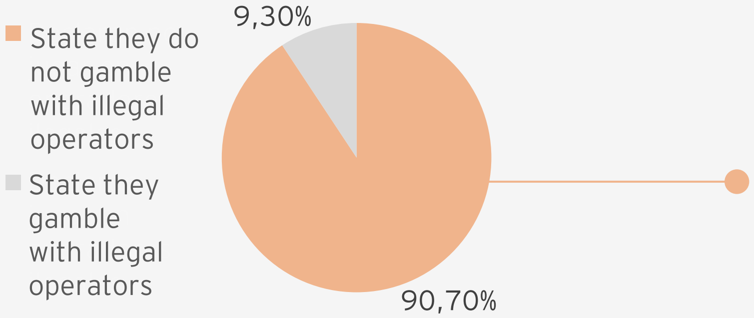
What domains do the websites you have used most frequently have?

47,5%

Of the surveyed population report using domains other than ".es", such as .com, .org, .co, .io, .bet, etc.

272 responses

Data extracted from the survey conducted by Jdigital together with operators



What domains do the websites you have used most frequently have?

47,5%	**.org, .com, .io, .bet, etc.**
52,5%	**.es**

272 responses

Source: Jdigital Survey y EGBA

In 2024, unregulated online gambling generated approximately €231M, representing 16% of the value of the regulated market

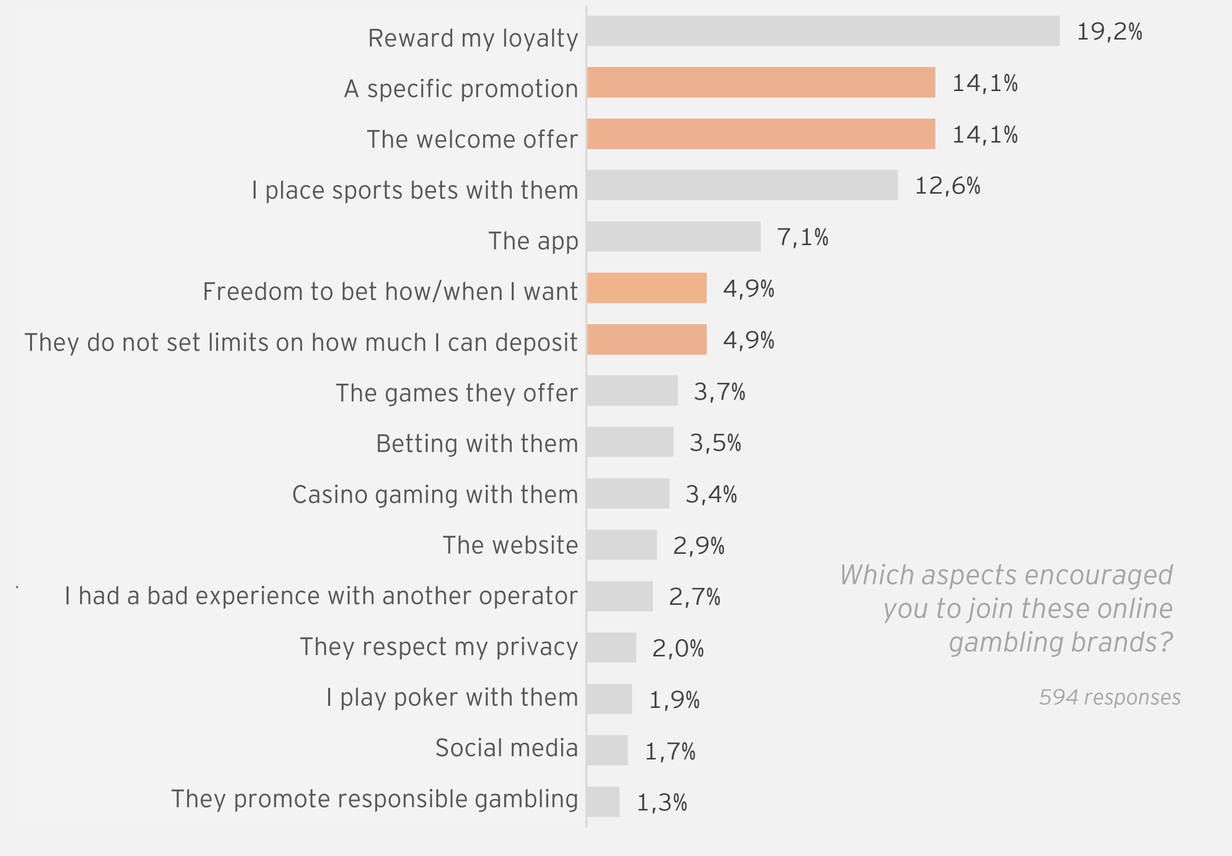
Unregulated online gambling has consolidated itself as a phenomenon with growing economic and social impact in Spain.

Based solely on the data from this survey, the unregulated online gambling market is estimated at €231 million, representing **16% of the current value** of the regulated market, according to the DGOJ. This figure is higher than the 10% estimate published by other private entities such as H2, as reported by Investigate Europe.

Far from being an isolated market, its growth is largely explained by multi-homing user behaviour (players who combine legal and illegal platforms) and by **high-intensity players**, who divert part of their spending towards environments without effective oversight.

This shift is driven by **more aggressive incentives**, including welcome bonuses, easier deposit and withdrawal processes, faster registration flows, the absence of limits, and acquisition through semi-private environments such as social networks or messaging channels. In most cases, these act as access points or incentives directing users towards the unregulated market.

INCENTIVES OFFERED BY UNREGULATED WEBSITES THAT MOST ATTRACT CONSUMERS

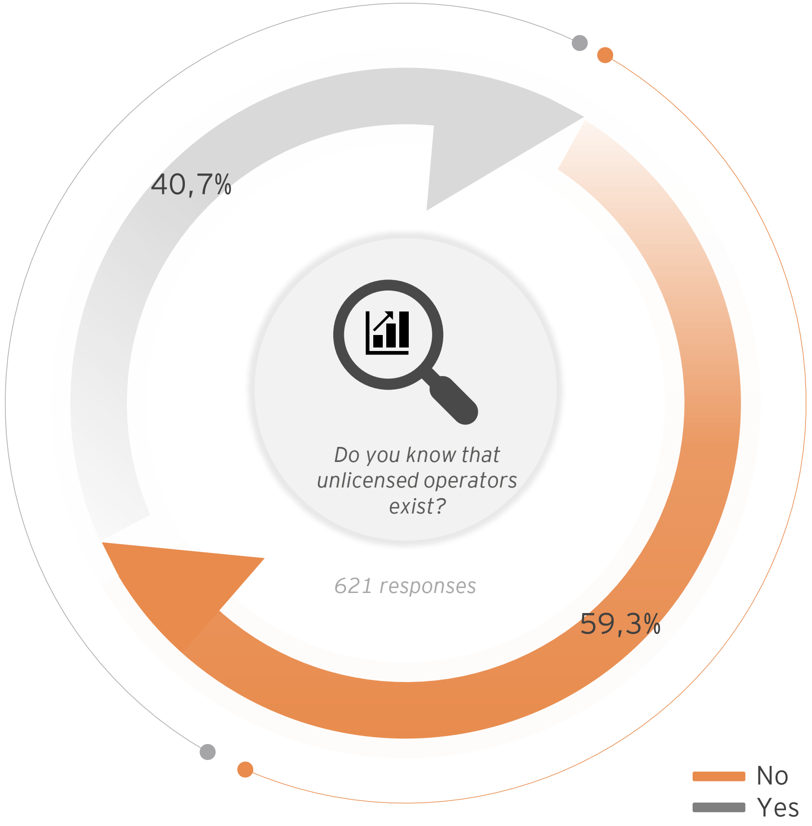


Data extracted from the survey conducted by Jdigital together with operators

Source: Jdigital Survey, Investigate Europe

In Spain, the use of unregulated operators is driven by digital exposure and the lack of control on social networks and Telegram

Data extracted from the survey conducted by Jdigital together with operators



The survey included a broad list of online gambling operators in Spain, both regulated and unregulated, and participants were asked whether they were familiar with them. These operators were identified through documentary research and with the support of industry experts and licensed operators in Spain.

Only **40.7%** of respondents stated that they were aware of the existence of unregulated operators, while **23.4%** declared that they had played on at least one illegal platform, either knowingly or unknowingly. This figure represents approximately more than 374,400 active individuals aged 18 to 65. All of these results are drawn from a population that plays within legal environments, suggesting that the actual figure is likely to be significantly higher.

Regarding **acquisition channels**, **44%** of participants reported discovering these operators through websites or online searches, followed by advertising on social networks (33%). According to data published by StatCounter, Google holds a 72% market share, positioning it as the primary search engine and enabling **unlicensed operators to pay for prominence** and rank above regulated operators in search results.

Although to a lesser extent, **Telegram** is gaining relevance within the unregulated sector, consolidating itself as an emerging acquisition channel for these operators.

 Source: Jdigital Survey, StatCounter y DGOJ

2 Methodology

1
2
3
4
5
6
7
8
9

Why and how was the survey conducted?

Response rate

1.095
Users contacted

995
Answered the first question

9.1% dropped off

861
Answered the second question (Gambling products)

13.4% dropped off

770
Completed the survey

10,6% dropped off

CONTEXT

The survey aims to understand the behaviours, motivations and perceptions of players who access, either partially or regularly, unlicensed operators, in order to identify acquisition channels, the factors driving migration from the regulated market, and the level of awareness of the risks associated with unregulated gambling.

TARGET

- Population aged 18 to 65 using digital gambling platforms and operators.
- Excluded: participants who only play lotteries.

HOW WAS IT CONDUCTED?

The analysis is based on online surveys distributed through Jdigital **member operators as well as additional distribution channels**. The objective is to obtain a representative view that enables a more accurate assessment and understanding of the impact of unregulated digital gambling in Spain.

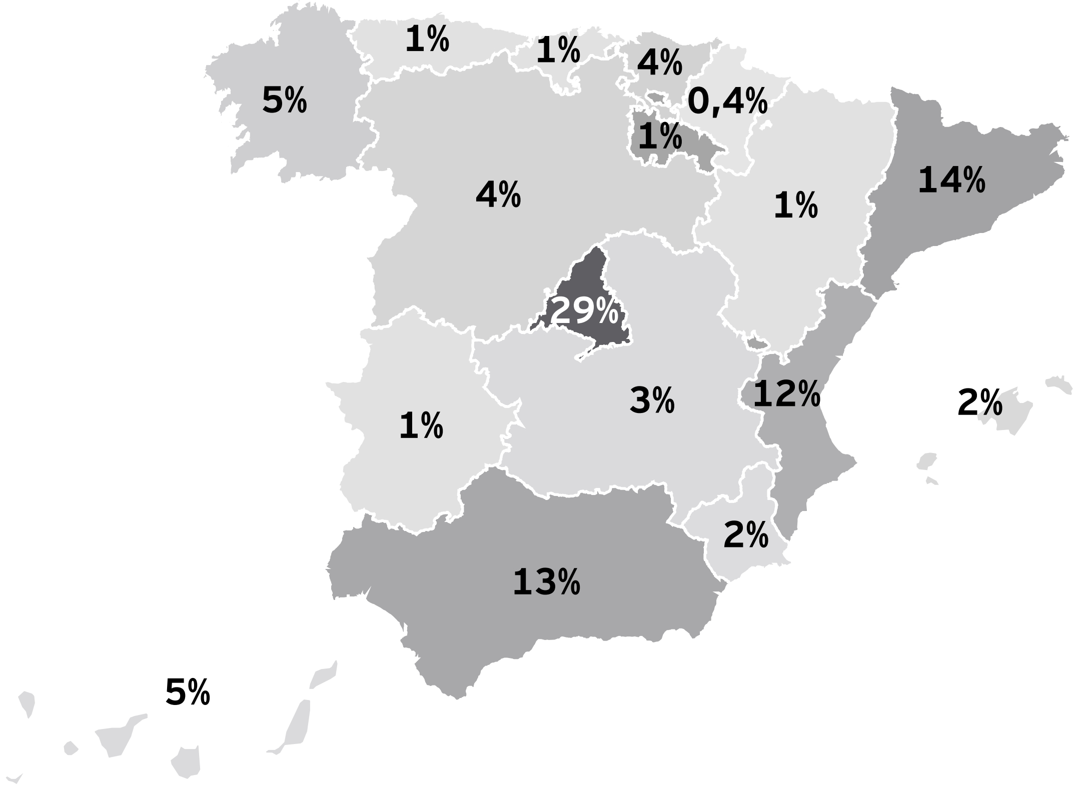
What did we ask?

The questionnaire was structured into three core sections plus one contextual information block:

		Questions	Objective
SECTION I	Demographic information	Age, gender and nationality	Identify the respondents' profile (age, gender and nationality) in order to segment the results.
SECTION II	Gambling activity and brands used	Gambling products and frequency	Understand which channels and types of products players currently use and how frequently.
		Gambling brands used over the past year	Identify awareness and usage of regulated and unregulated operators, including undeclared ones.
		Incentives, acquisition channels and domains	Analyse which factors or channels drive access to operators.
SECTION III	Gambling expenditure	Methods used to deposit funds	Assess the most commonly used payment methods and their relationship with the legal or illegal nature of the operator.
		Amount deposited and wagered	Quantify average spending levels and identify behavioural patterns by player type.
SECTION IV	Perception and risks of illegal gambling	Perception of unlicensed operators	Measure the level of awareness of gambling regulation among users of legal and illegal operators.
		Associated risks	Analyse sensitivity to the economic and legal risks of unregulated gambling.

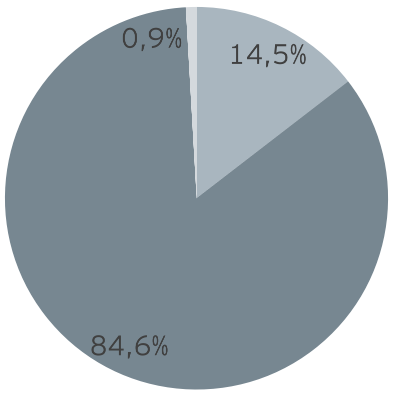
Who answered the survey?

99% of the sample was collected within Spanish territory, ensuring a high level of national representativeness. The remaining percentage corresponds to participants primarily located in France, Ireland and Sweden.



672 responses

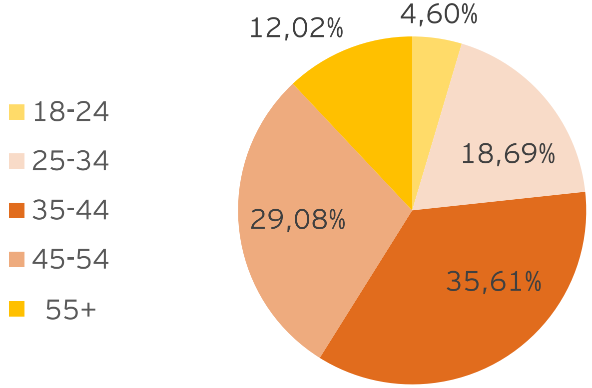
How is the sample distributed?



84.6% of respondents are male

671 responses

The sample is predominantly concentrated in the 35-44 age range.



674 responses

Source: Jdigital Survey

3

Introduction: Definitions and scope

1
2
3
4
5
6
7
8
9

It is essential to have a clear understanding of the gambling market, both regulated and unregulated

WHAT IS CONSIDERED GAMBLING?

Gambling refers to those activities that:

- Involve staking money. In other words, free-to-play or purely entertainment-based activities do not require an operating licence.
- Are based on future outcomes or chance, regardless of the level of skill involved.
- Offer prizes, either in cash or in kind.

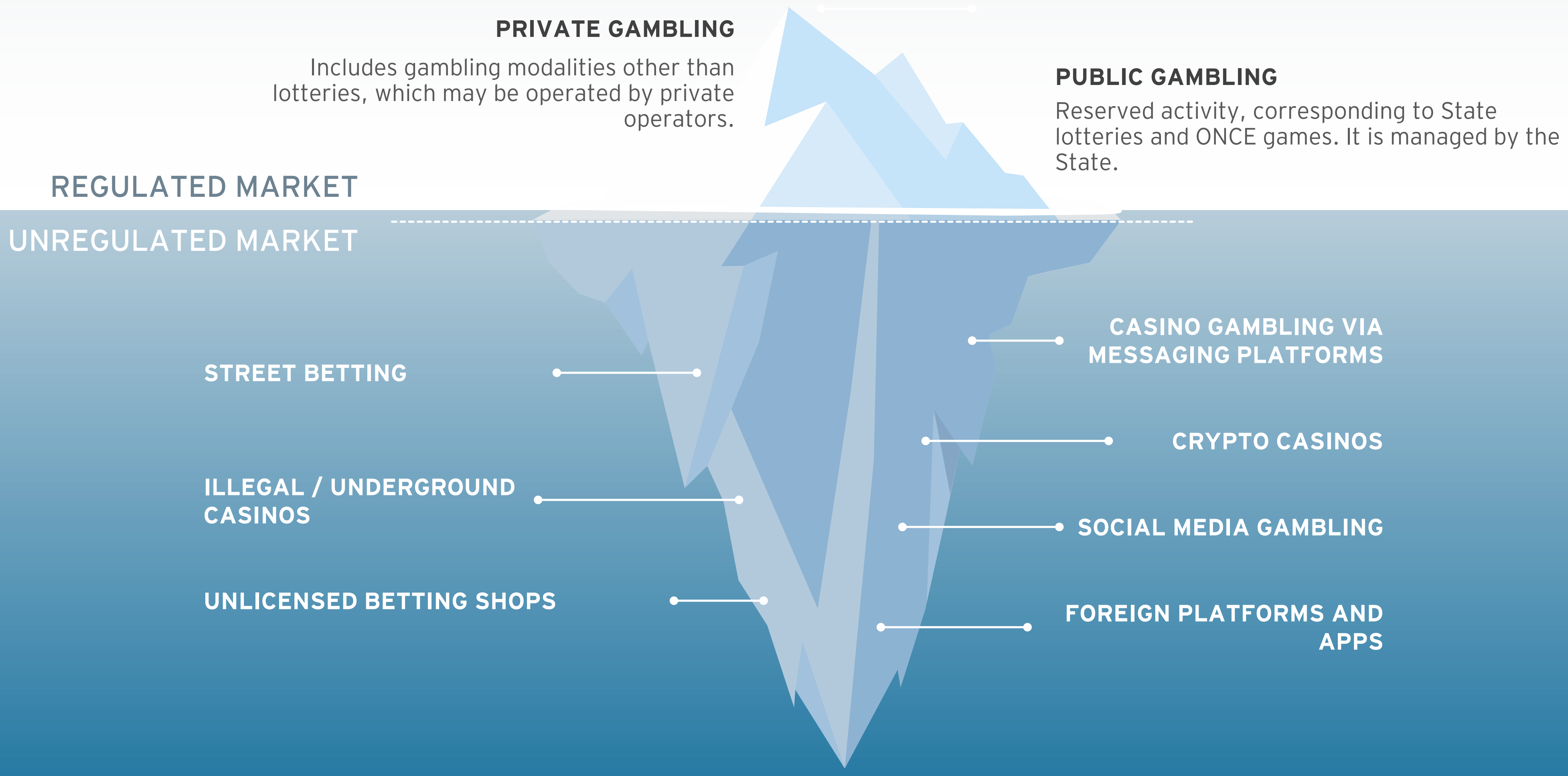
REGULATED GAMBLING MARKET

- Includes gambling and betting activities, whether land-based or online, that are authorised through a licence issued by the DGOJ or the relevant regional authorities, as applicable.

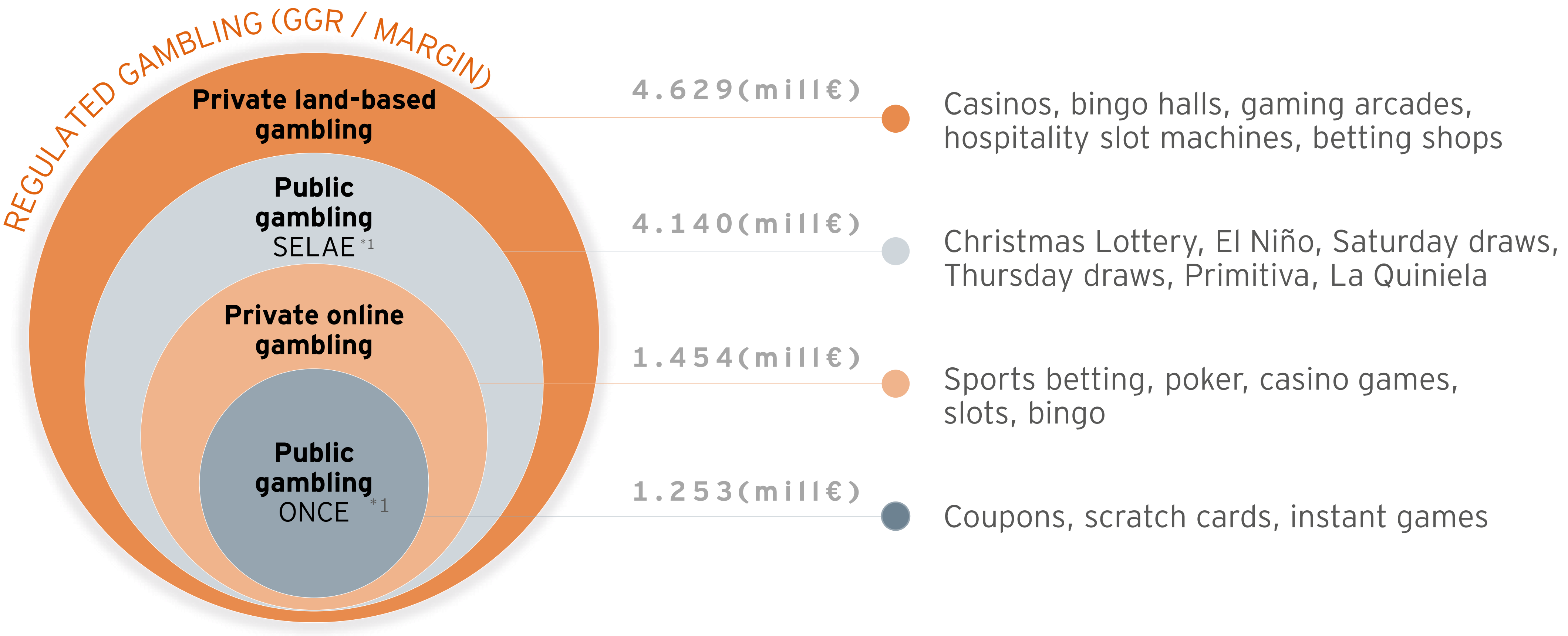
UNREGULATED GAMBLING MARKET

- Refers to gambling activity in the black market, provided by operators not authorised under Spanish gambling regulations, excluding small-scale social games.

The distinction between regulated and unregulated gambling defines the levels of protection and legality within the sector



Private gambling reaches €6.083bn in GGR, combining both private online gambling (24%) and private land-based gambling (76%)



Source: CeJuego 2024 Yearbook and DGOJ
*1 Online and in-person game

1
2
3
4
5
6
7
8
9

4

The impact of the regulatory framework on the gambling market in Spain

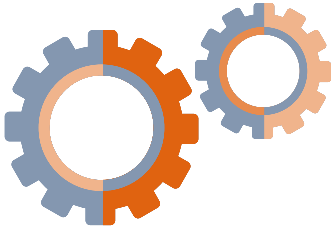
Context and risks

In Spain, gambling supervision is primarily the responsibility of the Directorate General for the Regulation of Gambling (DGOJ), an independent body under the Ministry of Consumer Affairs, together with the regional authorities responsible for land-based gambling.

These institutions define and oversee compliance with an increasingly stringent regulatory framework, whose overarching objective is to ensure consumer protection, prevent problematic gambling behaviours, and guarantee the integrity and transparency of the market.

However, excessive regulatory pressure may have unintended effects: it can limit the competitiveness of licensed operators and, as a result, reduce the attractiveness of the regulated offer.

The underlying risk is that part of the consumer base may seek alternative options among unauthorised operators, where levels of protection, security and consumer safeguards are significantly lower.



The regulatory framework must protect consumers without undermining the competitiveness of the regulated market, thereby preventing migration towards unauthorised operators.

The Spanish regulatory framework prioritises consumer protection but overlooks market strengthening

RD 958/2020

Objective: To regulate **advertising and promotion** of gambling in order to protect the most vulnerable groups, particularly minors and young people. The decree aims to reduce indiscriminate exposure to commercial gambling messages.

Impact:

- Reduced visibility of betting shops and licensed operators across traditional and digital media.
- Enhanced social protection by limiting advertising time slots, sports sponsorships and campaigns targeting at-risk audiences.
- The creation of a more restrictive and controlled advertising environment, which strengthens the sector's social responsibility, but also reduces the competitive capacity of regulated operators compared to illegal offerings that are not subject to these constraints.

RD 176/2023

Objective: To reinforce **the protection of all participants** in gambling activities, with particular focus on **vulnerable groups** such as individuals aged 18-25, intensive gamblers and self-excluded players. The decree introduces new control, traceability and responsible gambling mechanisms, partially repealing Royal Decree 958/2020 to move towards safer gambling environments.

Impact:

- Increased technical and administrative obligations for operators, who must implement additional monitoring and prevention systems.
- Strengthened user protection, within a more complex and restrictive regulatory framework.
- Risk of reduced competitiveness of the regulated market, as rising costs and regulatory barriers place licensed operators at a disadvantage compared to operators not subject to these requirements.

Source: DGOJ y BOE

Impact RD 958/2020

One of the consequences arising from the implementation of RD 958/2020 is that, by restricting advertising by regulated operators, space is created for unregulated operators to fill this gap with their own advertising and promotional activity.

In practice, when conducting a Google search using terms such as "new betting sites", the first four results typically correspond to **comparison portals that primarily redirect users to unlicensed providers.** This means that most users searching for new operators are initially exposed to illegal offers.

The impact is even greater when considering that Google Chrome is by far the most widely used browser in Spain, accounting for 72% of total market share.

This also raises important questions about the role of the platform itself: while **Chrome provides visibility to unregulated operators, similar searches on other browsers such as Microsoft Edge or Firefox tend to display only licensed operators.**

This phenomenon is closely linked **to the security and trustworthiness criteria that influence Google's ranking algorithms**, according to sources consulted for this study*. Although websites that meet recognised trust signals generally achieve higher rankings, unlicensed providers have learned to skilfully replicate these attributes, effectively misleading both search engines and users alike.

SEARCH ENGINE MARKET SHARE IN SPAIN - SEPTEMBER 2025

Chrome	Safari	Edge	Firefox	Samsung Internet	Opera	Otros
72%	15%	4%	3%	2%	2%	1%

Source: DGOJ y *StatCounter

Jdigital | EY

5 The European context of unregulated gambling

Overview of illegal online gambling in Europe

In 2024, illegal online gambling dominated the European market, both in terms of revenues and digital visibility, leading to significant fiscal losses and putting at risk the sustainability of licensed operators and the regulatory framework itself.

- **Scale and market weight:** The unregulated channel has become the main player in European iGaming, accounting for approximately **71% of online GGR** (≈ €80.6bn out of a total €114.3bn). The regulated market remains a minority segment, despite continued growth.
- **Recent dynamics:** The illegal segment is accelerating rapidly (+53% year-on-year) and capturing disproportionate value: for every €1 generated by regulated operators, illegal operators capture **2,4€.** This reflects a competitive imbalance and low effective channelling towards safer, licensed offers.
- **Reach and exposure:** Digital visibility strongly favours unregulated operators. The promotional content encountered by users overwhelmingly points to unlicensed websites, with tens of millions of Europeans interacting with them each year.
- **Public and market impact:** Estimated tax losses exceed **€20bn per year**, alongside lower levels of player protection (weak KYC, lack of limits and responsible gambling measures) and distorted competition driven by aggressive bonuses, alternative payment methods and cross-border acquisition strategies.
- **Key drivers:** Restrictions on legal channels (advertising, bonuses and product design) that reduce their attractiveness; major **sporting events** that boost demand; **the rise of crypto-casinos**; and **international affiliation networks** that facilitate access to unlicensed foreign operators.
- **Implications for Spain:** Although Spain ranks among the European markets with lower illegal penetration, it remains exposed to the same online acquisition dynamics and must strengthen channelling mechanisms and international cooperation.

Source: YieldSec (European Casino Association)
RG: Regulated Game| KYC: Know Your Customer

Regulation is essential to guide markets from unregulated environments towards legal frameworks, ensuring protection, stability and sustainable growth

Gustaf Hoffstedt

SECRETARY GENERAL, SWEDISH TRADE ASSOCIATION FOR ONLINE GAMBLING

"The elephant in the room is that the licensed market is so tightly regulated that it does not appear attractive enough in the eyes of the consumer."

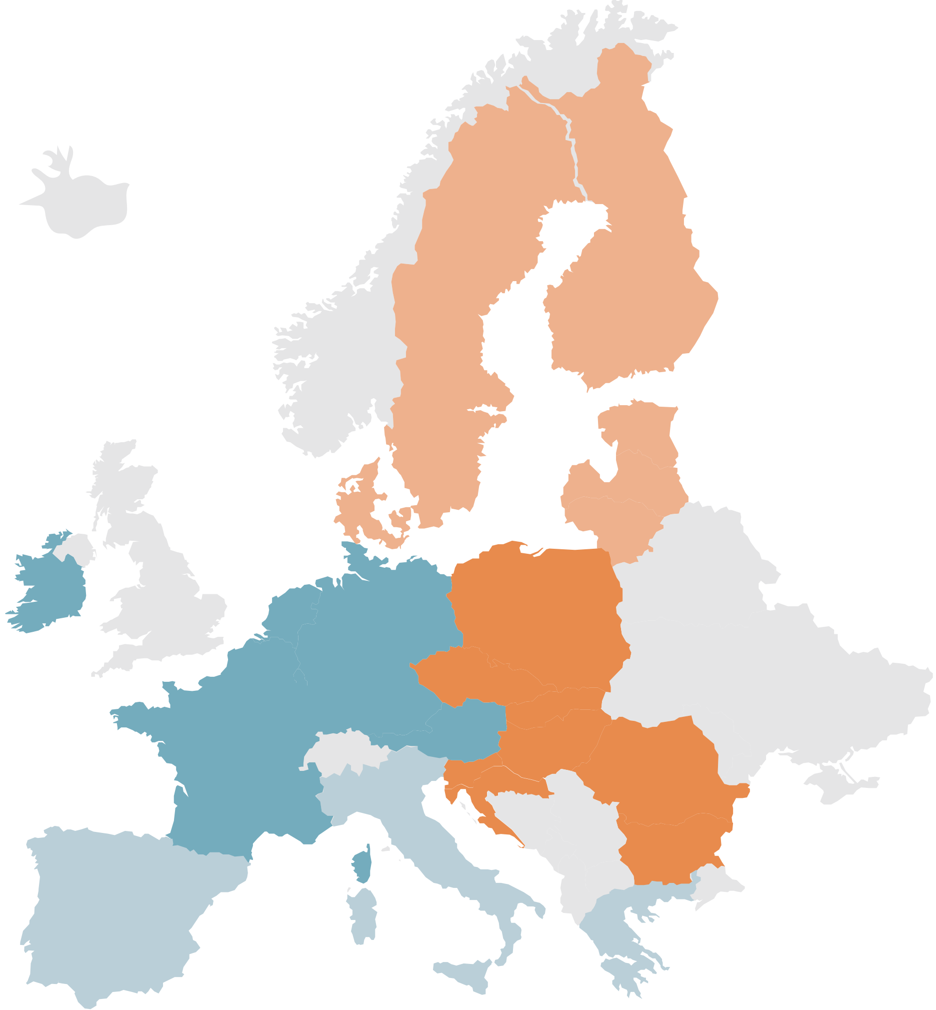
The issue is that the licensed market is regulated to such an extent that it fails to be sufficiently attractive for consumers.

Source: LinkedIn

In 2024, 71% of online gambling in the EU-27 was illegal, reaching 82% in Eastern Europe

Region	Total 2024 Legal (%)	Total 2024 Illegal (%)	Total 2024 Legal (€)	Total 2024 Illegal (€)	Total 2024 (€)
Northern Europe	45%	55%	€4.6	€5.7	€10.3
Southern Europe	42%	58%	€10.1	€14.0	€24.1
Eastern Europe	18%	82%	€6.5	€29.0	€35.5
Western Europe	28%	72%	€12.4	€31.9	€44.3
Total UE-27	29%	71%	€33.6	€80.6	€114.3

(€ billons)



Source: YieldSec (European Casino Association)

International experience shows that when regulatory restrictions intensify, illegal markets tend to gain ground. **The case of France in 2023, where the ban on online casinos led illegal gambling to account for nearly 50% of total market volume, clearly illustrates this dynamic.**

Excessively restricting the legal offer does not eliminate demand, it shifts it towards unauthorised operators, which are less transparent and operate outside institutional oversight.

Source: EGBA

6 The unregulated gambling market in Spain

Section based on the survey conducted by Jdigital in collaboration with the sector operators

The unregulated market lacks safeguards and poses greater risks to users

Operators in the black market are gambling and betting entities that operate outside the regulatory approval framework. As they are not subject to the safeguards imposed by regulation, this type of operator can be particularly attractive to certain player profiles, such as those seeking to bypass self-exclusion measures, use cryptocurrencies, or avoid gambling limits.

UNREGULATED OPERATORS

- Entities without official supervision, either in Spain or abroad, offering limited or no player protection guarantees.
- Includes illegal websites operating from foreign-based servers and informal betting channels based on messaging platforms.

OPERATORS REGULATED OUTSIDE SPAIN

- Operators licensed in other jurisdictions but not authorised by the Spanish Gambling Authority (DGOJ).
- Although their websites may not be illegal in their country of origin, providing services to Spanish players is not permitted, and they are therefore considered part of the black market.

Source: DGOJ

Unlike the legal market, unregulated operators circumvent key safe gambling requirements and avoid paying taxes on their net revenues

Financial Requirements

To operate legally, operators must apply for and **obtain the appropriate licence**, as well as **demonstrate financial solvency** through guarantees which, in the case of general licences, may reach up to €2 million.

Technical Requirements

Operators are required to ensure platform transparency and security through **strict technical standards and advanced encryption systems**, as well **as to use certified software that guarantees the randomness of results** and prevents manipulation.

Legal Requirements

Operators must have a clean legal record, maintain appropriate legal documentation and governance structures, implement **anti-money laundering (AML) controls**, and comply with **responsible advertising regulations** designed to protect minors and vulnerable groups.

Source: DGOJ

Unregulated operators can often be difficult for users to clearly identify

Spanish Gambling Law 13/2011 establishes that licensed operators must offer their services exclusively under a ".es" domain and display on their websites the Safe Gambling seal authorised by the DGOJHowever, some unregulated operators attempt to mimic the look and feel of licensed websites, reproducing official seals or visual identifiers in order to mislead users.

Which domains do the websites you use most frequently have?

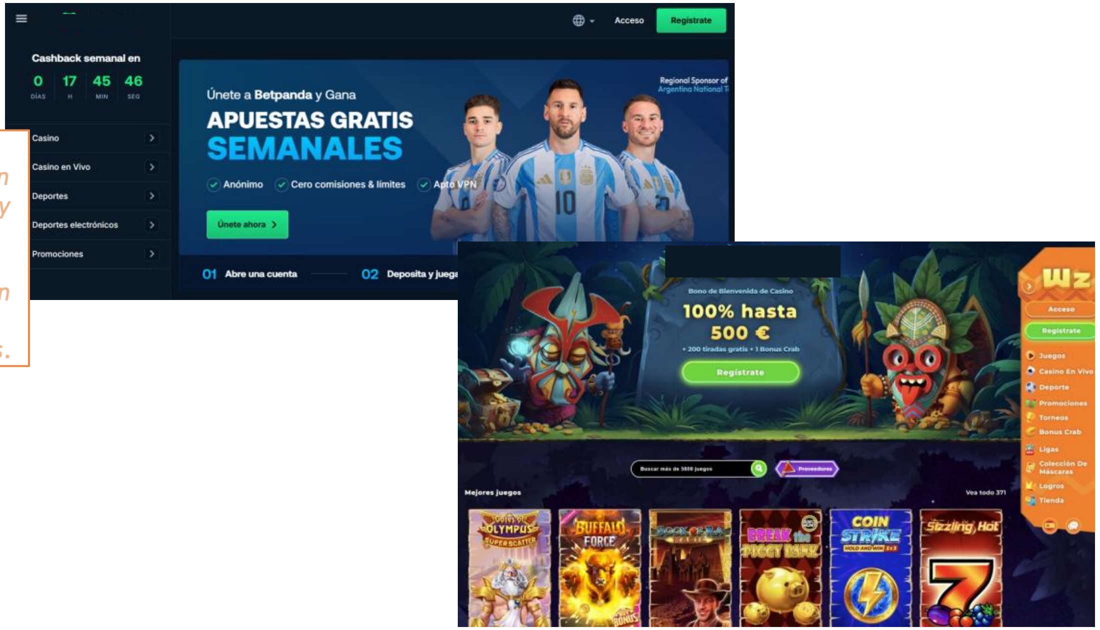
47,5%

Of the surveyed population report using domains other than ".es", such as .com, .org, .co, .io, .bet, etc.

272 responses

If we consider only respondents to this question who do not explicitly identify themselves as illegal gambling users, the figure would still reach 48.6% when including all users who access illegal gambling sites.

The widespread use of non-.es domains reveals that a significant share of the population accesses operators operating outside the DGOJ regulatory framework.



juego seguro

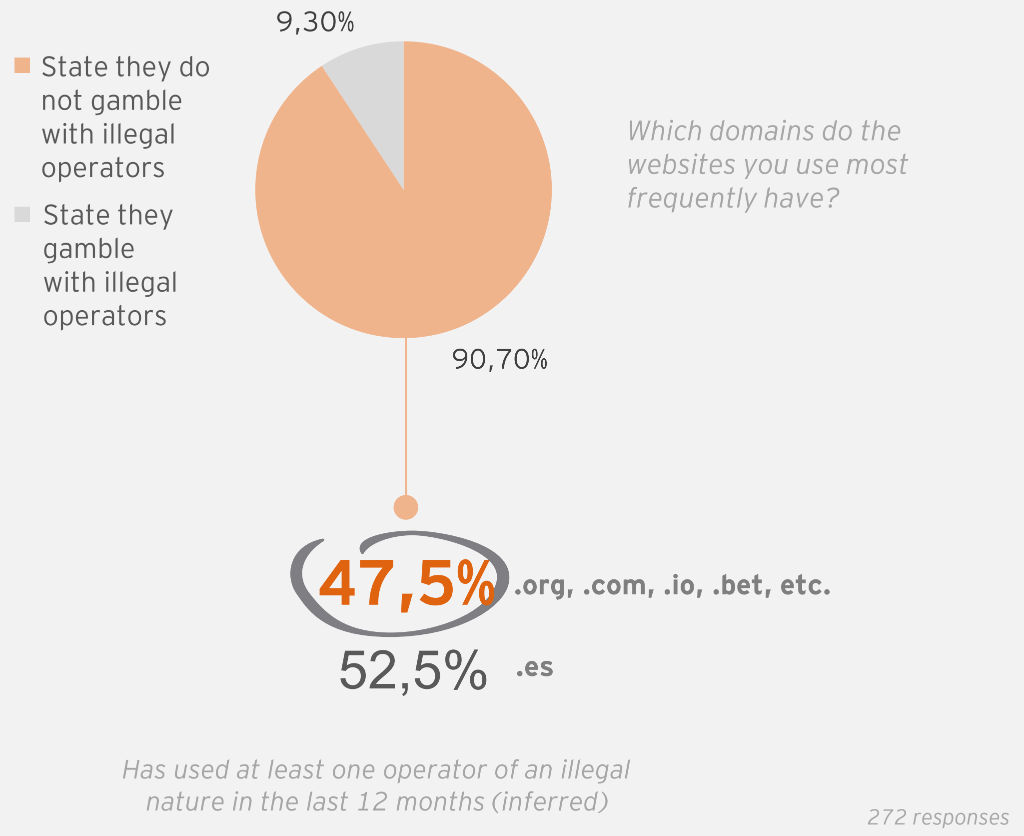
juego autorizado

Source: Jdigital survey

Among players who claim not to gamble illegally, 47.5% operate on illegal domains

Among players who state that they do not gamble with illegal operators, **47.5% nevertheless report using operators operating under domains other than ".es".** Conversely, among those who do acknowledge **gambling with illegal operators, 35.3% contradict themselves**, stating that they only use ".es" domains. This highlights a clear lack of user awareness regarding what constitutes a regulated operator and how to correctly identify one.

This pattern suggests that engagement with unregulated gambling is closely linked to a greater distance from official channels, which typically provide lower levels of supervision, transparency and consumer protection.



Source: Jdigital survey

26% of players explicitly state that they do not know how to distinguish between legal and illegal operators

26% of respondents state that they do not know how to distinguish between legal and illegal operators, while 15% state that they are not aware of the risks associated with using illegal operators.

Would you be able to distinguish between licensed and unlicensed operators in Spain?
Did you know that when playing with unlicensed operators you are not covered by the Spanish responsible gambling framework?

It is essential that users are fully aware of the risks they may face and take appropriate measures to protect both their well-being and their financial situation.

Main individual and social risks associated with illegal gambling

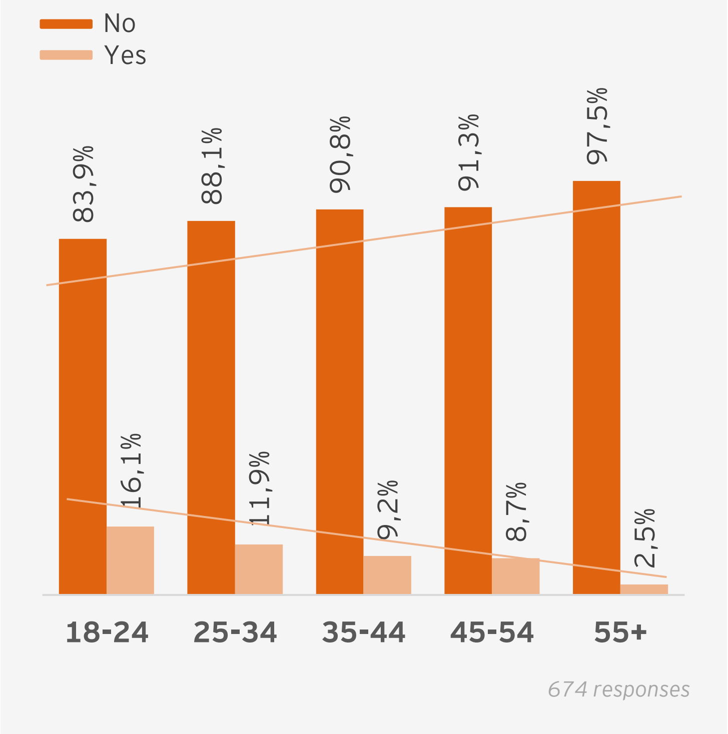
- **Fraud and scams:** Illegal gambling platforms often offer the possibility of winning large prizes without real guarantees, which can lead to fraud and scams.
- **Access by minors:** Many illegal gambling platforms are designed to attract underage users, which may result in exposure to harmful activities and negative influences on young people.
- **Legal consequences:** Participating in illegal gambling activities may lead to legal sanctions, including fines and prison sentences.
- **Gambling addiction:** Unlike regulated operators, unregulated ones do not comply with mandatory responsible gambling measures designed to protect users. This has a direct impact, as it undermines the effectiveness of the significant efforts made in recent years by licensed operators to implement such protections.

Source: Jdigital survey

Younger users show higher exposure to unregulated operators

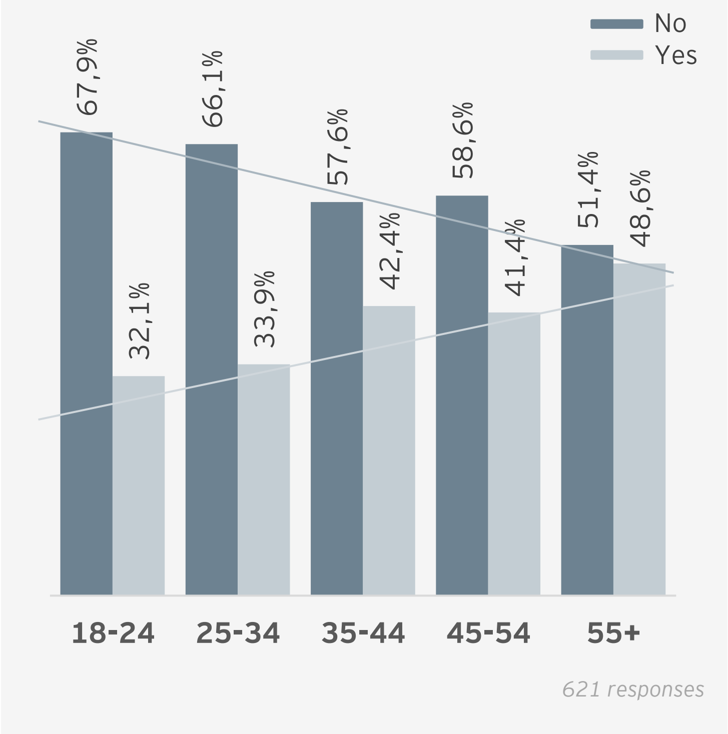
PLAYERS BY THE NATURE OF PLATFORMS USED (%)

Has used at least one illegal operator in the last 12 months (inferred)



PLAYERS BASED ON AWARENESS OF UNLICENSED OPERATORS

Did you know that unlicensed operators exist? (Self-declared)



The chart shows an inverse correlation between the use of illegal operators and the level of market awareness. The 18-24 age group is particularly concerning, as it combines the highest use of illegal platforms (16.1%) with the lowest level of awareness regarding the existence of unregulated operators (32.1%).

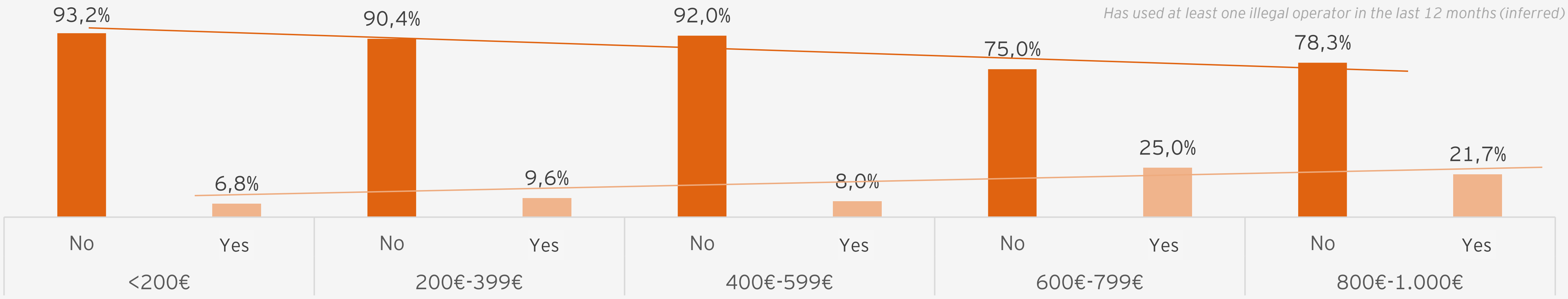
This lack of awareness of the associated risks implies that **younger users are the most exposed to unsafe gambling practices**, as they are less able to clearly identify which platforms operate without a licence.

As age increases, there is a progressive decline in the use of illegal operators, accompanied by greater market knowledge and increased awareness of associated risks.

Source: Jdigital survey

As spending increases, the use of unregulated operators rises

As the amount played increases, so does the likelihood of turning to unregulated platforms. If this pattern persists, the regulated market could be losing up to **32,4%** of its potential value within the surveyed sample.



Weekly amount wagered on online gambling by market segment (%)

570 responses

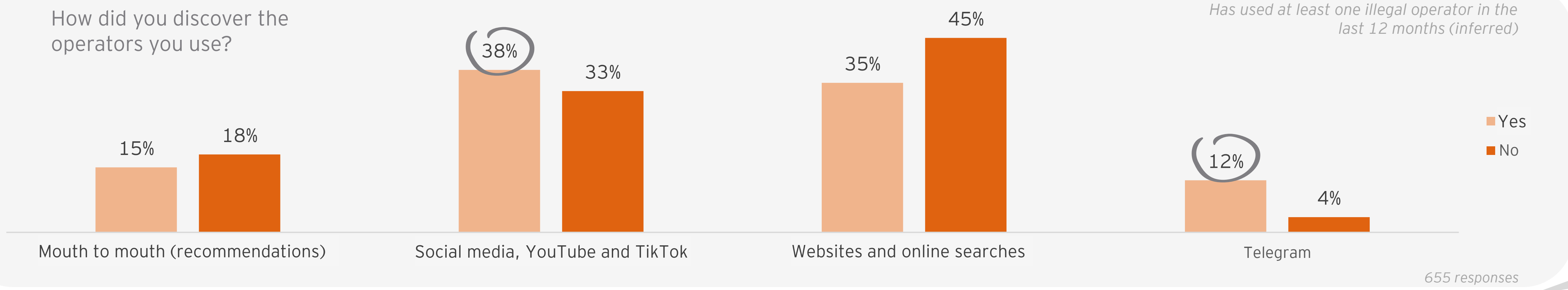
28,7%	25,4%	13,5%	8,1%	24,3%

In lower spending brackets, channelisation is high: among users wagering less than €600, around 90% play exclusively with regulated operators, and exposure to the unregulated market remains marginal. As the amount wagered increases, however, unlicensed platforms gain relevance, and the risk of migration towards illegal operators rises significantly.

Source: Jdigital survey

Access to unregulated online gambling in Spain relies on multiple channels, ranging from recommendations and traditional search to social media and Telegram

- **Social media as a gateway to illegal gambling**: Platforms such as YouTube, TikTok and Instagram account for 38% among users who have accessed illegal operators, slightly exceeding their relevance in the regulated market (33%). This reinforces the role of unsupervised digital channels as a key acquisition vector in the unregulated market.
- **Telegram as a differentiating channel**: Although its overall share remains smaller, **12%** of illegal players report having discovered operators through Telegram, compared to only 4% in the regulated market. This confirms the growing relevance of closed, less transparent channels as acquisition tools for unlicensed operators.
- **Word of mouth remains relevant in both markets**: Personal recommendations account for 18% among regulated players and 15% among those using illegal operators. While not the dominant channel, word of mouth continues to play an important role in building initial trust.

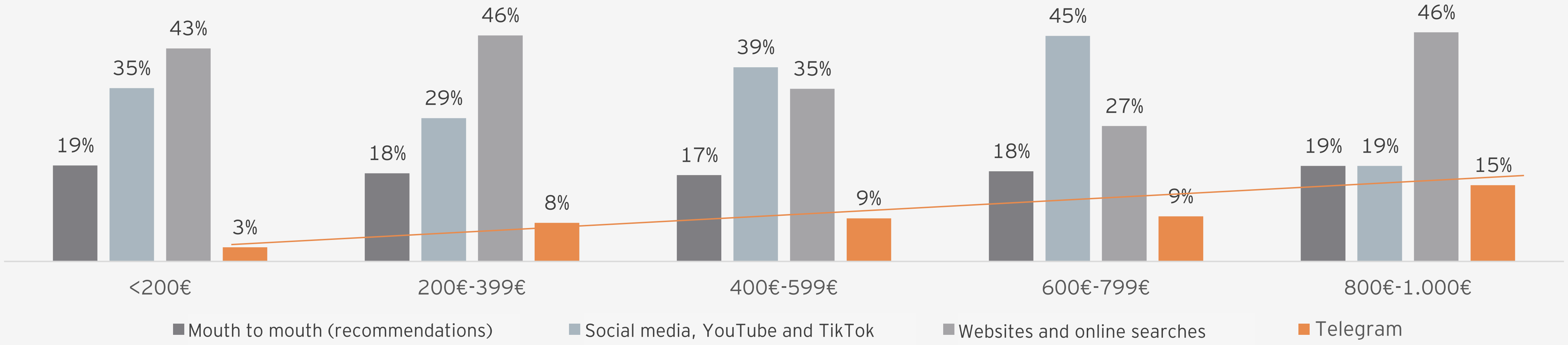


Source: Jdigital survey

High-value gamblers concentrate in closed, trust-based channels, while social media attracts mid-to-high spending profiles

- **Social media attracts mid-to-high spending players:** Platforms such as YouTube and TikTok reach their highest shares in the €400–€799 spending brackets, even outperforming word of mouth. This suggests that digital advertising and promotion on social media are particularly effective among recurrent spenders, but not among the very highest-value gamblers.
- **Telegram, while still a minority channel, grows with spending levels:** Its relevance increases progressively with higher spend, reaching nearly 15% in the €800–€1,000 segment. This reinforces the idea that Telegram acts as an alternative entry channel into the unregulated market, increasingly oriented toward high-spending user profiles.

How much do you deposit in online gambling per week?

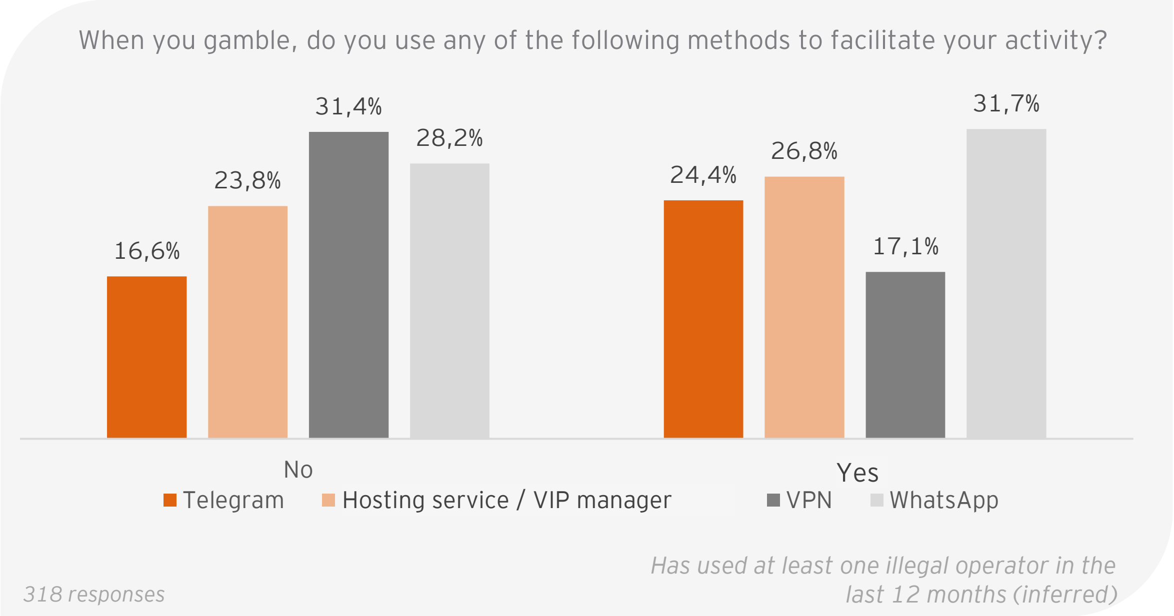


574 responses

Source: Jdigital survey

Channels such as WhatsApp emerge as the most common method to facilitate gambling activity

- Among users who interact with illegal operators, closed and highly personalized channels dominate, such as WhatsApp and hosting services or VIP managers. Their strong presence, together with Telegram, reinforces the idea that illegal markets rely on unregulated and mass-usage communication channels to coordinate operations.
- VPNs have become the most common method to access gambling platforms (29.6%), with even higher usage among those who declare they do not operate with illegal companies (31.4%). This reflects the use of VPNs both for privacy and security reasons and to bypass geographic restrictions, suggesting that a portion of these users may be accessing unregulated markets through VPNs.



Between 2021 and 2024, 75 companies were sanctioned for operating 156 illegal gambling websites in Spain, with fines amounting to approximately €350 million, which were never collected, as the websites remained active from abroad and concealed their activity through the use of VPNs.

This demonstrates that while VPNs are a common tool for accessing online gambling, in the illegal sphere they become a critical enabler for operating outside regulatory oversight, relying on less visible channels such as Telegram and WhatsApp.

Source: Jdigital survey | Investigate Europe

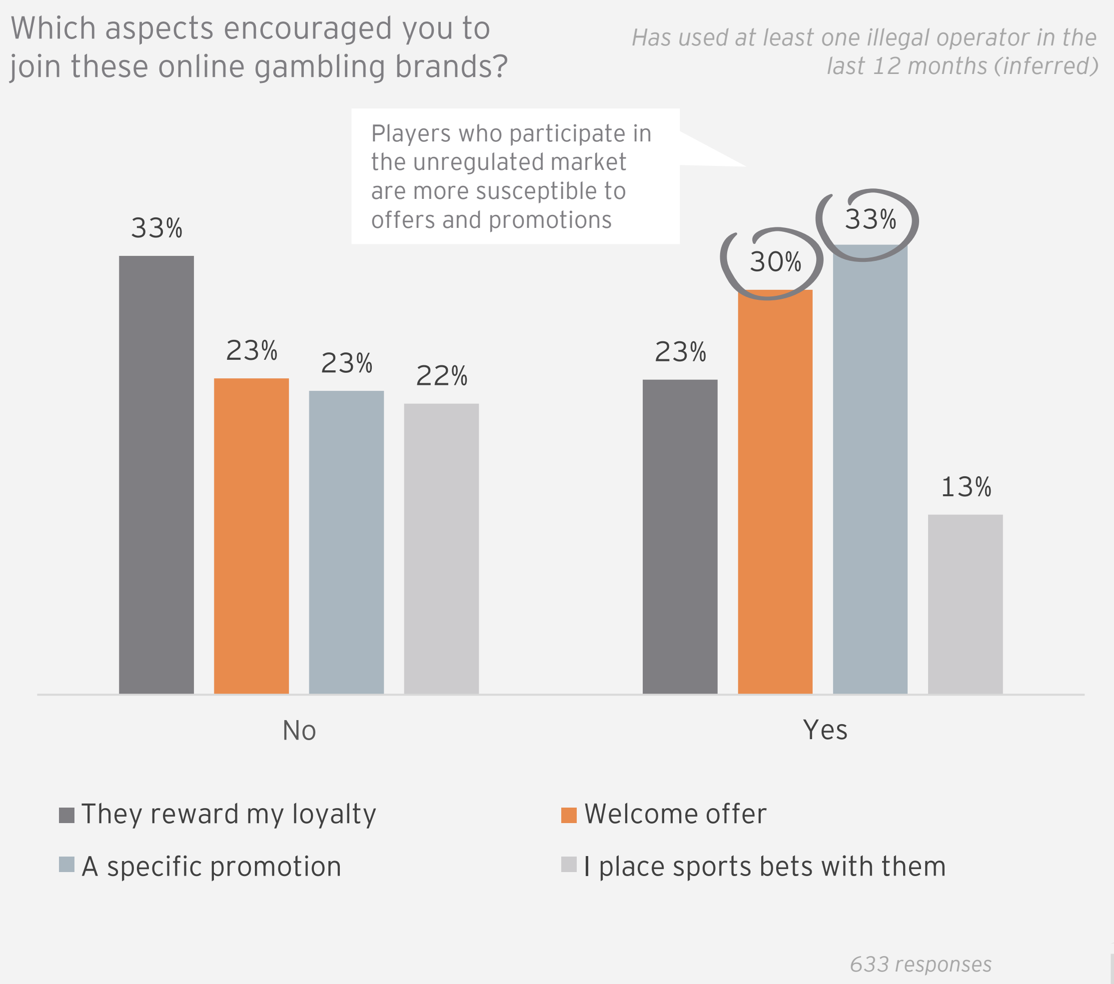
29,8% of the sample identify economic incentives as the primary driver for player acquisition

The chart shows the main acquisition incentives reported by respondents, considering both those who have used illegal operators in the last 12 months and those who have not.

The analysis reveals that **the primary incentives are loyalty rewards (17.6%), welcome offers (12.9%), specific promotions (12.9%) and sports betting incentives (11.6%).**

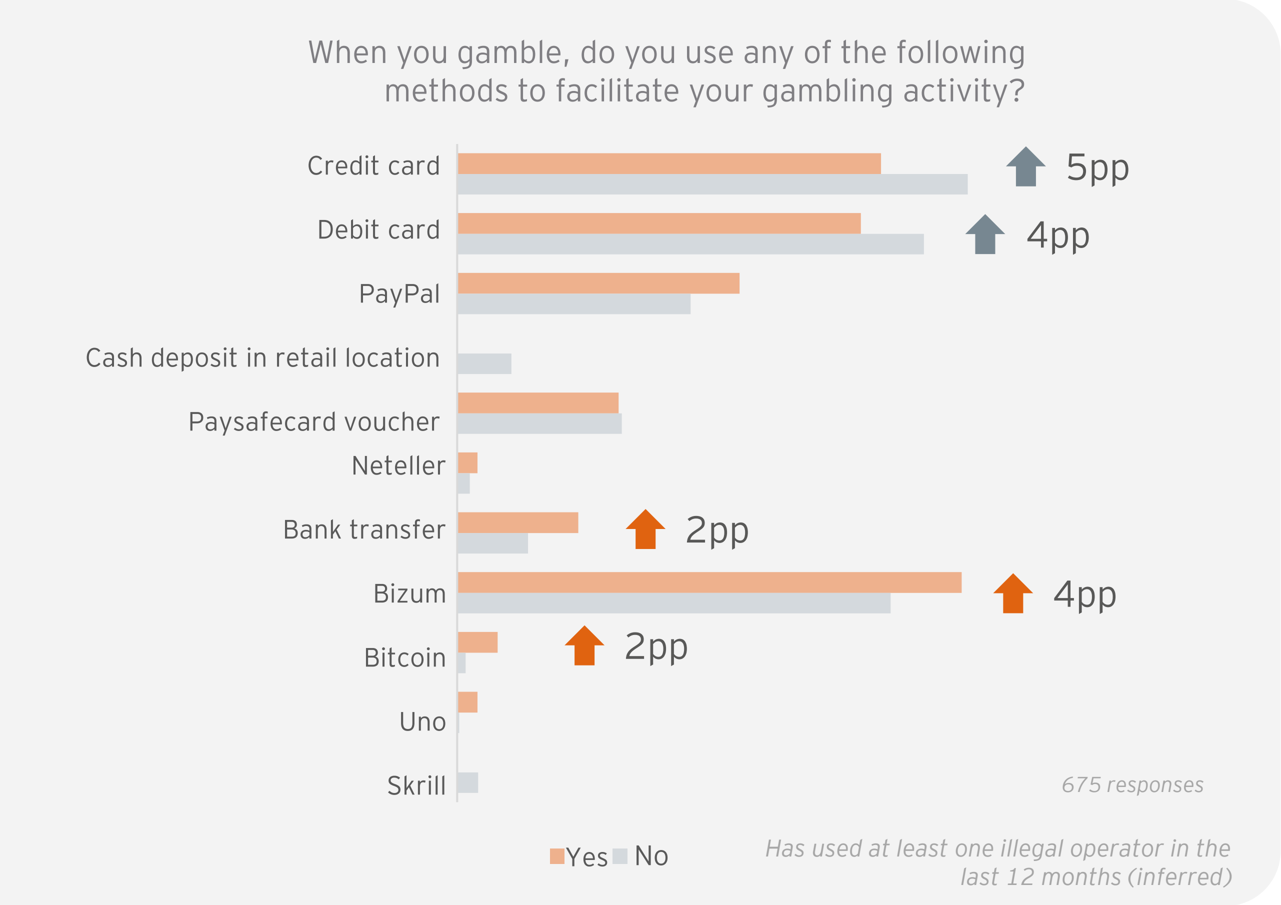
Among respondents who state they have gambled with illegal operators, **welcome bonuses** and **promotions carry** even greater weight, **highlighting their role as the main attraction mechanism toward the unregulated gambling market.**

However, the effectiveness of this measure is ambivalent. On the one hand, it aims to protect more vulnerable users from aggressive incentives. On the other hand, it may prove counterproductive, as illegal operators, free from these restrictions, **can offer significantly higher bonuses and therefore gain a competitive advantage** in acquiring new players, reinforcing the shift toward the unregulated market.



Source: Jdigital survey

Differences in payment methods: illegal operators prioritize Bizum and cryptocurrencies, while regulated markets rely on card payments



Respondents who have used at least one illegal gambling operator show a payment behaviour very similar to those who have not, with **credit and debit cards remaining the predominant transaction methods within the regulated gambling market.**

However, a slight difference emerges in the preference for digital payment methods such as **Bizum** and, to a lesser extent, **Bitcoin** among users who have interacted with illegal operators. This pattern may indicate **a search for greater speed or anonymity in transactions.**

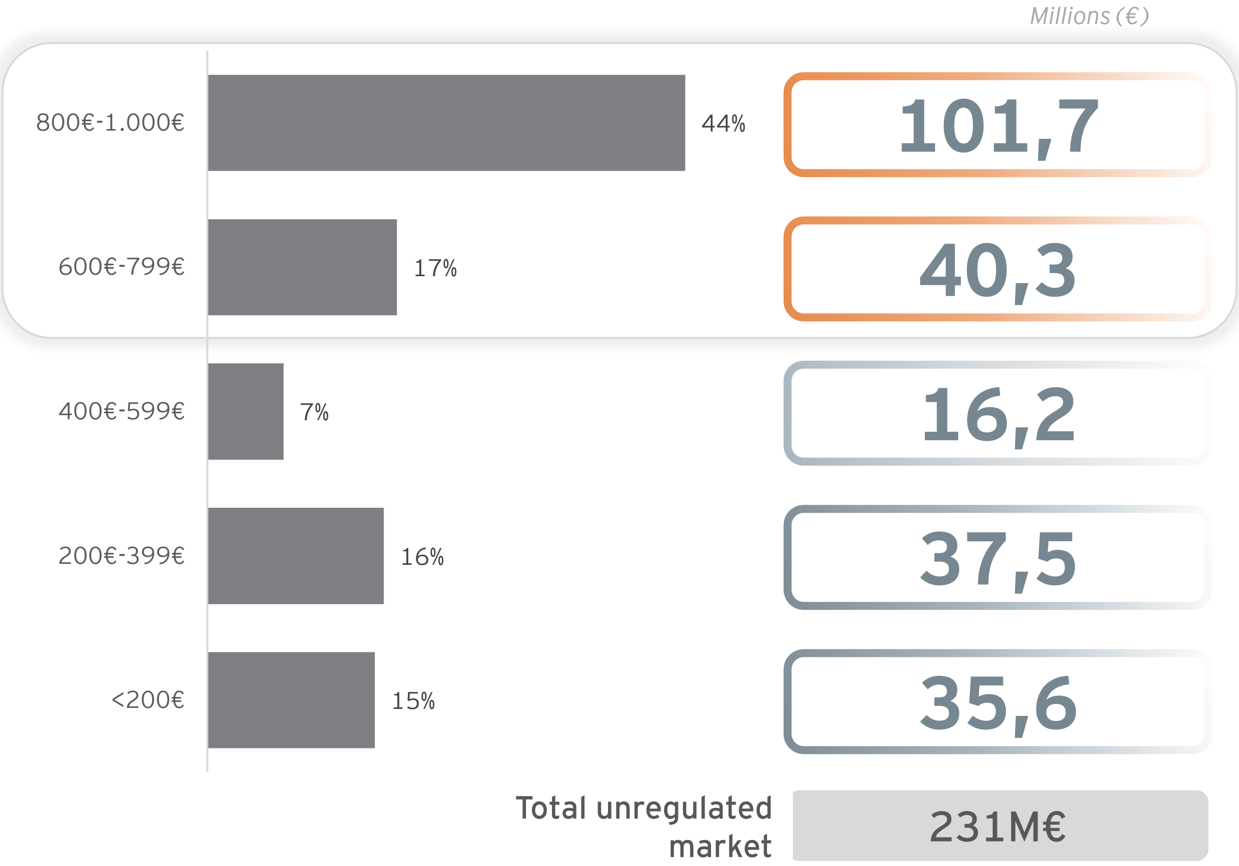
In contrast, cash deposits made in physical retail locations are used exclusively by respondents who have not engaged with illegal operators, suggesting that illegal gambling activity is predominantly digital and online-based.

Overall, while the differences are subtle, they point to a shift toward more modern and potentially less traceable payment methods among users associated with illegal gambling operators.

Source: Jdigital survey

An estimated €231M (16% of the regulated market) was wagered in Spain's unregulated online gambling market

ESTIMATED DISTRIBUTION OF THE UNREGULATED MARKET SIZE (2024)



Estimated value of active players who report gambling regularly on illegal platforms.

We define users of illegal gambling platforms as those who report having used such platforms at least once, including both unlicensed operators and operators licensed outside Spain that are accessed through social networks or messaging services. According to the survey results, 9.3% of players explicitly state that they participate in unregulated operators. When translated into monetary value, this figure represents approximately 16% of the total market, equivalent to around €231 million in 2024.This estimate is likely conservative, as the study only captures information from players who have operated in the regulated market at least once, **excluding users who gamble exclusively in unregulated environments.**

A significant **61.4%** of total spending is concentrated in the higher spending brackets (above €600 per month), suggesting that the unregulated market is largely driven by high-intensity players with a greater propensity to shift part of their activity away from the regulated environment. This profile, which is more exposed and more sensitive to economic incentives and ease of access, reinforces the hypothesis of a selective leakage from the regulated market toward unlicensed platforms.

Stricter requirements constrain regulated activity and open the door to the unregulated market. Users find advantages that regulation denies licensed operators…

…such as ease of access, welcome bonuses, simplified registration processes, the absence of deposit limits, fewer advertising restrictions, and alternative payment methods.

7

What's next?

Joint Deposit Limits

In April, the DGOJ opened a public consultation on a Royal Decree introducing a system of joint deposit limits, under **which each player sets a global cap on their deposits across all platforms, subject to direct supervision by the regulator.**

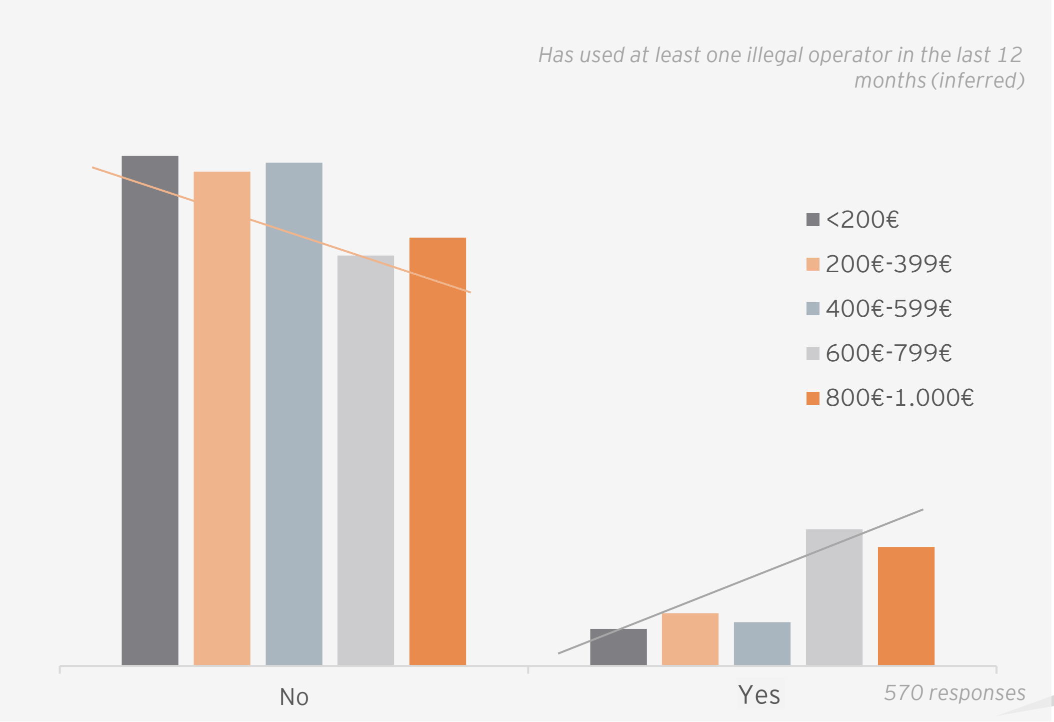
While the regulation aims **to strengthen consumer protection** by establishing an overall deposit cap per player, it may produce unintended effects. The data show that players with higher monthly deposits are more likely to turn to unregulated operators. If an additional restriction is imposed within the regulated market on top of this predisposition, the likelihood that this segment migrates to illegal gambling once the limit is reached increases.

65%

618 responses

State that they place all or most of their gambling spend with their main operator, which encourages a concentration of activity among large operators, often foreign-based, to the detriment of smaller players.

An additional consequence is that these restrictions, if not accompanied by stronger measures on traceability and player education, may generate a **substitution effect: players who exceed their limits in the regulated market may shift their activity to unregulated environments with fewer safeguards,** reducing both consumer protection and the tax revenues associated with the regulated sector.



Source: Jdigital survey

Risk Behaviour Detection Mechanism

The new risk behaviour detection mechanism, promoted by the DGOJ as part of the implementation of Royal Decree 176/2023, introduces a common and mandatory algorithm for all regulated operators. This system will enable the early identification of players displaying patterns of problematic gambling, such as excessive or compulsive behaviour, or indicators of gambling addiction.

The objective is twofold: on the one hand, to strengthen the protection of vulnerable groups, including minors, young people and individuals with addictive behaviours; on the other, to ensure a consistent and harmonised application of responsible gambling policies across the sector, avoiding discrepancies between operators and reinforcing trust in the regulated market in contrast to the illegal offering.

Its implementation will entail a **significant technical and operational burden for operators,** who will be required to adapt their systems, invest in advanced analytics tools, and apply intervention protocols when risks are detected. **While this mechanism may improve the security of the regulated environment, it also poses implementation challenges** and raises the risk that excessive rigidity could incentivise players to migrate towards unauthorised operators.

15,2% **State that they are unaware that when gambling with unlicensed operators they are not covered by the responsible gambling policies established under Spanish regulation.**

570 responses

Source: DGOJ and Jdigital survey

8 Conclusions

1
2
3
4
5
6
7
8
9

Conclusions

The survey shows that 23.4% of respondents would gamble in unregulated environments

Based on the platforms and websites used by players, the survey indicates that 23.4% of respondents would gamble in unregulated environments. In addition, 9.3% explicitly state that they operate on unlicensed platforms. The regulatory framework must protect consumers without undermining market competitiveness, as excessive restrictions may generate the opposite effect to that intended, encouraging migration towards unregulated operators.

A large share of players believe they are gambling legally, but actually do so on unregulated websites

47,5% of players who believe they are gambling legally admit having accessed domains other than ".es". This phenomenon, driven by the search for greater flexibility and lack of information, exposes thousands of users to environments with no oversight or consumer guarantees.

The main driver of migration to illegal gambling is welcome offers and bonuses

30% to 33% of players who engage in illegal gambling acknowledge doing so due to welcome offers and bonuses. Notably, the absence of deposit limits, cited by **4.9%,** becomes the fourth most mentioned factor, rising to 9.8% when including responses referring to "freedom when betting". By contrast, in the regulated market, loyalty rewards (33%) remain a key driver for players.

High-spending players lead the migration towards unregulated gambling

The presence of players on unregulated platforms reveals a significant migration from the legal market towards uncontrolled environments, primarily driven by high-intensity players, who account for an estimated **231€ million** in spending in 2024, representing more than **16% of the regulated market.** This pattern confirms that unregulated gambling is growing not only in volume, but also in risk profile, concentrating economically significant activity and heightening challenges in player protection and supervision.

Social media and Telegram emerge as new acquisition channels for unregulated gambling

New unregulated acquisition channels are emerging as alternative access routes to gambling. On the one hand, **social media platforms** primarily attract medium to high spenders, while **Telegram** is consolidating as the preferred channel among the highest-spending profiles.


Fira Barcelona Gran Via
19 - 21 ENERO 2026
ICE
www.icegaming.com/WGF | #WGF26
ICE WORLD GAMING FORUM
Presented by GCI GAMING COMPLIANCE INTERNATIONAL
Más de 400 reguladores de todo el mundo se reúnen en ICE para debatir la principal prioridad del evento y su programa regulatorio: la lucha contra el juego ilegal.
Únete a la conversación, descubre más y regístrate aquí.

1
2
3
4
5
6
7
8
9

9 Annex

9.1

Glossary

Glossary

- **DGOJ** (Directorate General for the Regulation of Gambling):The authority responsible for the regulation, licensing, supervision, coordination, control and, where applicable, sanctioning of state-level gambling activities in Spain. It operates under the Ministry of Social Rights, Consumer Affairs and Agenda 2030, within the remit of the Secretary of State for Consumer Affairs and Gambling.
- **Sports and Event Betting:** Bets placed on sporting competitions and other events, including political, entertainment or non-sporting outcomes.
- **Bingo**: A game in which players match numbers on their cards with numbers drawn at random, played both in land-based venues and online.
- **CAGR** (Compound Annual Growth Rate): The average annual growth rate over a period longer than one year.
- **Casino**: A category that includes traditional table games (such as roulette, blackjack and baccarat), slot machines and their online equivalents.
- **Mobile Devices:** Smartphones and tablets used to access online gambling services.
- **EGBA** (European Betting and Gaming Association): Industry association representing licensed online gambling operators in Europe.
- **Gross Gaming Revenue** (GGR): The total value of stakes placed by players minus winnings paid out, representing the operator's revenue before operating costs and taxes. Also referred to as gross win or gross gambling yield in some markets.
- Online Gambling: Gambling activities carried out via the internet, either through websites or mobile applications.
- **Land-based Gambling:** Gambling activities that take place in physical locations such as casinos, betting shops, lottery outlets, gaming halls and bingo venues.
- **Lottery:** A category of games of chance that includes traditional draws, scratch cards and instant-win games, typically operated by state monopolies.
- **Gaming Machines**: Electronic betting machines, video lottery terminals and slot machines located in physical venues outside casinos.
- **Poker**: A card game in which players bet on who holds the best hand, played both in tournaments and cash games.
- **Products**: Specific types of gambling activities (e.g. sports betting, casino games, lotteries) offered both land-based and online.
- **Channelisation Rate**: Measures the proportion of players who participate in licensed / regulated operators relative to the total market. It is a key indicator of regulatory effectiveness.

9.2

The regulated gambling market in Spain

Recent figures of online gambling in Spain

The Spanish gambling market is structured as a broad-reaching sector, with a significant user base and a relevant volume of turnover.

	PUBLIC GAMBLING Games of chance		PRIVATE GAMBLING Games of entertainment	
	SELAE	ONCE	LAND-BASED	ONLINE
Mill. €	*Lotería de navidad, El Niño, Sábados, Jueves, Primitiva, La Quiniela*	*Coupons, scratch cards, instant-win games*	*Casinos, bingo halls, gaming venues, slot machines in hospitality, betting shops*	*Sports betting, poker, casino games, slots, bingo*
Players	25,9	8,8 coupons 3,6 *scratch cards*	6,2	1,6
GGR	3.948	1.142	4.629	1.269
Turnover	9.956	2.624	17.390	4.060
Advertising spend	59	59		88

Source: CeJuego Yearbook 2024

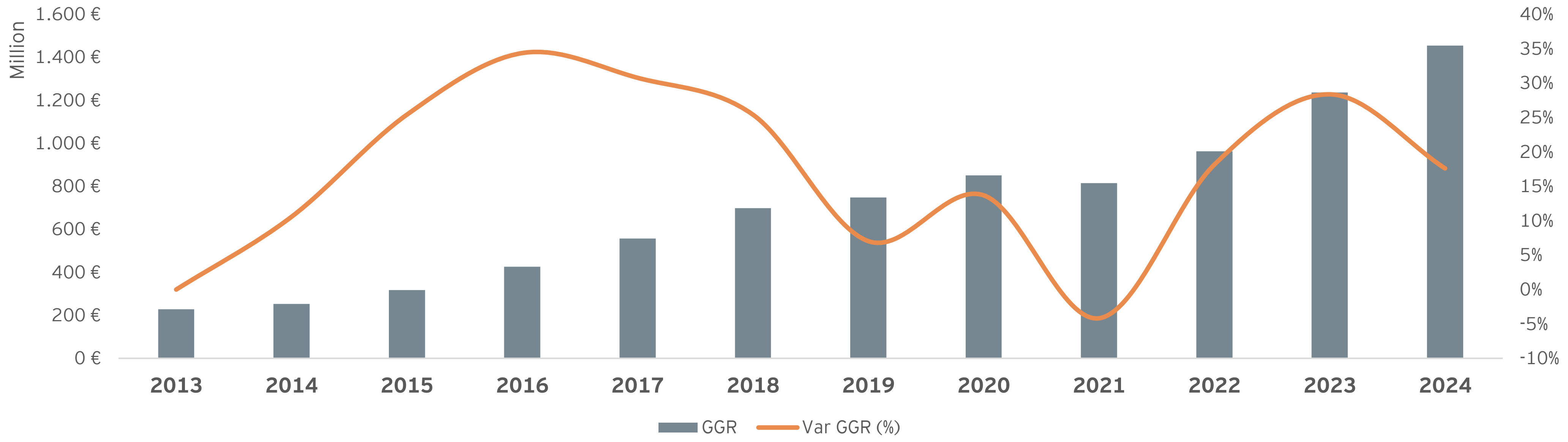
Recent trends in online gambling in Spain

Explanation of the sector's evolution, based on DGOJ data

Published data show a sustained upward trajectory in online gambling GGR over the last decade, with a particularly strong momentum in recent years. After several years of moderate growth and certain volatility, the sector regained dynamism from 2022 onwards, reaching a historic peak in 2024, surpassing €1.5 billion in GGR.

Although year-on-year growth rates have fluctuated, the overall trend points to a progressive consolidation of the online channel as a key driver of gambling activity in Spain. Nevertheless, the pace of expansion appears to be moderating, suggesting a market maturation phase following the sharp increases observed in previous years.

EVOLUTION OF ONLINE GAMBLING GGR



Source: DGOJ

Data on the annual evolution of the monthly average of active and new accounts show a clearly upward trend in the number of users who regularly participate in online gambling. Since 2013, the volume of active accounts has grown steadily, reflecting a continuous process of consolidation and maturation of the digital channel.

This growth has been particularly pronounced since 2020, reaching a historic high in 2024, with more than 1.4 million active accounts per month.

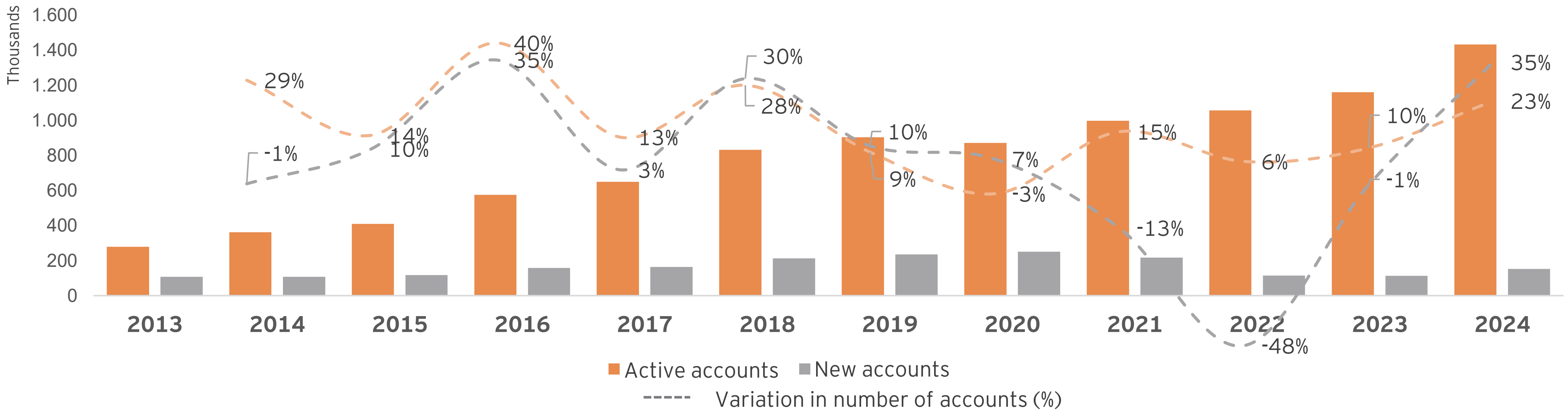
This sustained increase in activity suggests that online gambling has progressively integrated into the leisure habits of a significant share of the population, strengthening its position as a core consumption channel within the sector.

However, the evolution of new accounts follows a much more contained trajectory, remaining relatively stable in recent years.

The combination of these two dynamics—increased activity among existing users and stabilization in the inflow of new players—points to a more mature market stage, where growth increasingly depends less on attracting new users and more on retaining and engaging active ones.

This situation indicates a shift in the sector's development phase, with reduced reliance on extensive growth and a greater focus on recurrence, value per user, and the long-term sustainability of the existing user base.

ANNUAL EVOLUTION OF THE MONTHLY AVERAGE OF ACTIVE AND NEW ACCOUNTS



Source: DGOJ
Considerations: If an individual is registered with multiple operators, each operator with which they have participated is counted as an active account. From 2022 onwards, an account is considered new when it makes its first deposit.

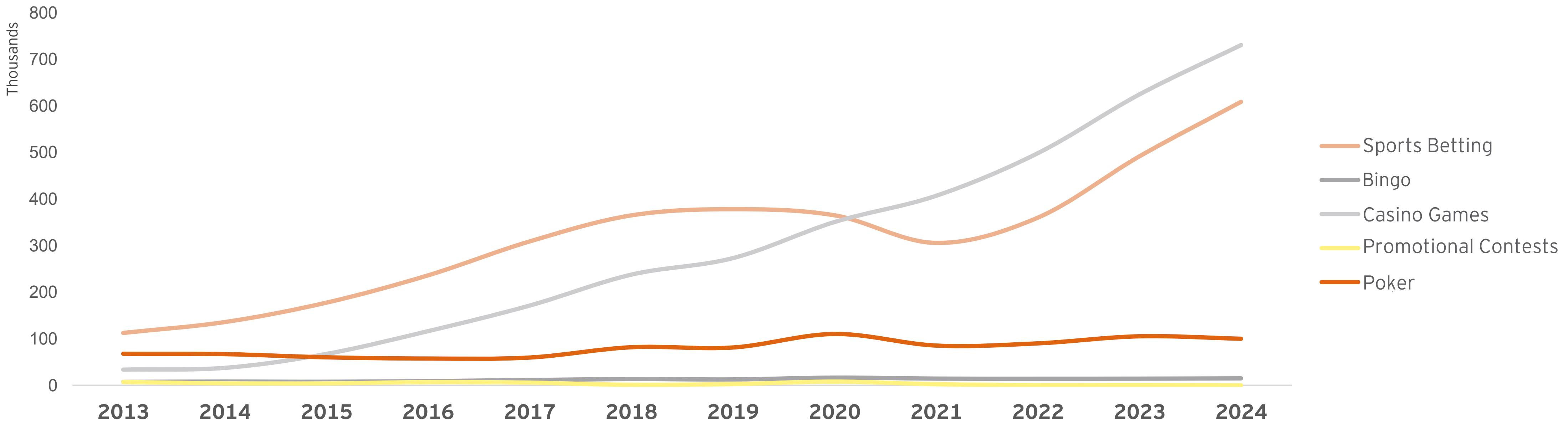
The evolution of online gambling GGR by segment shows a progressive transformation in the relative weight of each modality. Sports betting, historically the main driver of the market, experienced strong growth until 2018, followed by a period of stagnation between 2019 and 2021. Since 2022, the segment has regained momentum, reaching over €600 million in 2024 and once again consolidating itself as one of the pillars of the sector.

The casino segment, for its part, has maintained steady and sustained growth throughout the entire historical series, intensifying from 2020 onwards.

In 2024, casino exceeded €700 million, becoming the leading source of online channel revenues and demonstrating greater stability and user retention compared to the volatility observed in sports betting.

By contrast, poker, bingo and contests continue to record lower and more stable volumes, with no significant growth in recent years. This dynamic highlights an increasing concentration of revenues around casino and betting, while the remaining segments progressively lose relevance within the overall online gambling mix.

EVOLUTION OF ONLINE GAMBLING GGR BY SEGMENT



Source: DGOJ

Overview of the Legal Gambling Market in Europe

TOTAL GAMBLING MARKET REVENUE (GGR) – EU-27 & UK

Gross Gaming Revenue (€bn)
P = Forecast -- E = Estimate

Maarten Haijer

SECRETARY GENERAL EGBA

"The European gambling market recorded sustained growth in 2024. While land-based gambling remains dominant and continues to grow in absolute terms, online channels are showing stronger momentum, driven by changing consumer preferences and technological progress. Looking ahead to 2025, we expect online gambling to surpass the 40% market share milestone, with this trend continuing in the coming years and approaching parity with land-based gambling by 2029."

Source: H2 Gambling Capital 2025 y EGBA

Regulatory Framework and International Cooperation

The regulatory framework for online gambling in Europe is characterised by a high degree of fragmentation: each country establishes its own rules, while the European Commission only harmonises minimum requirements. This lack of regulatory unity makes international cooperation essential to address an illegal market that is clearly transnational in nature.

ROLE OF THE EUROPEAN COMMISSION

The EU does not have a single, unified online gambling law. Its role is limited to coordinating minimum requirements in areas such as consumer protection, anti-money laundering and data protection.

CROSS-BORDER COOPERATION

The transnational nature of illegal gambling requires stronger cooperation between authorities and the implementation of joint control and enforcement measures.

NATIONAL AUTHORITIES

Each country regulates independently, adopting different models and levels of channelisation. These disparities contribute to the leakage of demand towards the illegal market.

REGULATORY TREND IN THE EU

Increasing restrictions on legal gambling may be reinforcing the attractiveness of the illegal market, according to recent studies.

Key Challenges in the European Framework

1. **Regulatory fragmentation:** Each EU Member State sets its own rules, resulting in an uneven framework with no common standards.
2. **Lack of effective coordination:** Illegal operators act on a cross-border basis, while supervision remains largely national, without a common European framework to align criteria and enforcement.

Jdigital

ASOCIACIÓN ESPAÑOLA DE JUEGO DIGITAL

www.jdigital.es