



Seminar:
**The Future of Consumer
Profiling & of Commercial
Communications**
at



GIURISPRUDENZA
DIPARTIMENTO
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***Using AI to protect
Online Gamblers***

Is profiling bad?

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, **personal preferences**, interests, reliability, **behaviour**, location or movements; Art. 4(4) GDPR

In gambling, profiling is associated with targeted ads and harmful behaviour. Commercial communications address:

- ◆ Regular players (addicted?)
- ◆ Vulnerable / weak groups

results in threats to players' autonomy & **online manipulation**:

(EDPS Opinion 3/2018)

- ◆ Lack of information;
- ◆ Restriction of options;
- ◆ Creation of necessities based on psychological traits and vulnerabilities

Lawfulness to be tested under art. 22 GDPR

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Responsible Gambling: General Principles

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1. Providers To tackle harmful gambling behaviour

- i) Messaging
 - ◆ Standard texts: *play responsibly*
risk of addiction & loss of property
 - ◆ Warnings per player: *regarding timing*
regarding amounts
- ii) Hyperlinks pointing to addiction helplines / harm support
- iii) Timing (between bets / between sessions)
 - ◆ No credit / no replaying of profit

2. Self-exclusion of players (Centralised data base?)

3. Keeping an “account”

- ◆ Important: to connect each physical person to one account
- ◆ Contains: a) Gambling history,
b) Financial data (amounts spent / bet/ won)

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**Can AI make
profiling
good?**

Data facilitating profiling:

- ◆ Gaming characteristics & habits (nationality, games, currency, location)
- ◆ Response to offers or promotions
- ◆ Introduction by other players / members
- ◆ Financial data (amounts spent / won / bet)

Cummulative processing may lead to categorisation:

- ◆ to identify players exhibiting harmful behavior (leading to addiction)
- ◆ to issue on screen warnings / pop-up windows

AI techniques create the profile of each player in order to identify harmful behavior

Effectiveness: *related to self-regulation and players' self-discipline*

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Profiling as a “blessed” task

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