

SPINMODO · THE STRATEGY

Own the licensed-slots **trust layer** in German search

Not a bonus site, not a comparison site — the licensed operator that explains the rules honestly. German adults searching informational, compliant slots vocabulary (**slots · online spielothek · automatenspiele**) — never brand-led or bonus-led terms.

ACQUISITION MODEL

Organic search on compliant vocabulary — the only open channel at scale — supported by a brand-term paid test. Link layer: fixed-fee affiliate only, s.5(6).

MAIN TRAFFIC SOURCES

Organic search (primary) · Direct (brand demand, starts at zero) · Referral (fixed-fee only) · Paid search (brand terms, dayparted 21:00–06:00).

FUNNEL

Informational content → trust pages (licence, RTP, KYC) → registration → KYC verification → first deposit.

Informational content



Trust pages



Registration



KYC verification



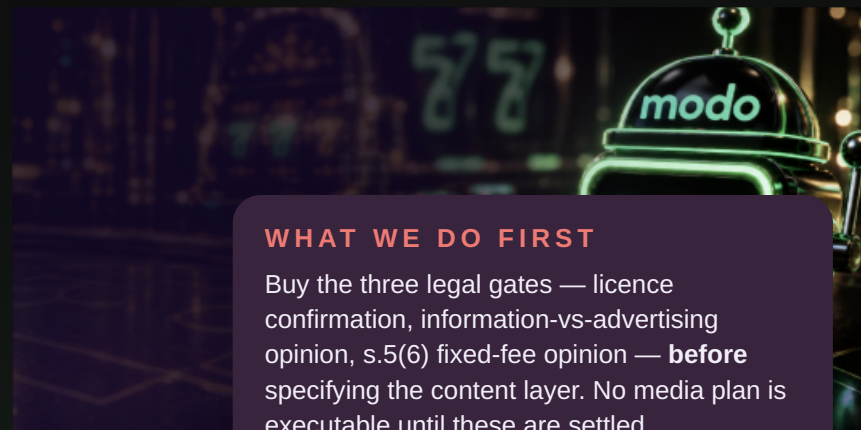
First deposit

YEAR-1 OBJECTIVE

Reach JackpotPiraten-level organic presence in the licensed-slots niche.

WHAT WE DO FIRST

Buy the three legal gates — licence confirmation, information-vs-advertising opinion, s.5(6) fixed-fee opinion — **before** specifying the content layer. No media plan is executable until these are settled.



CHANNEL STRATEGY

Every channel, its **measured permission state** — closed ones included

CHANNEL	STATE	ROLE IN THE PLAN / KPI	RISK / RULE	CHANNEL	STATE	ROLE IN THE PLAN / KPI	RISK / RULE
SEO	OPEN	1 Month 1 — primary; only open channel at scale Non-brand organic sessions	Gate-2 opinion needed before pages publish.	Digital PR	OPEN	3 Month 3 — authority; data-led stories Quality referring domains	Open flank — not an incumbent strength.
Paid Search	OPEN · contested	2 Month 2 — brand test, daypart 21:00–06:00 CPC; brand impression share	Contested (17 of 20). EUR 10–16 CPC on compliant terms.	ASO / App	CLOSED · year 1	5 Year 2 — deferred	7 squatter apps live — protect brand at launch.
Meta / Facebook	CLOSED	Not available in year 1	German ad rules ban slot advertising.	AI / GEO / LLMO	OPEN	3 Month 2 — visibility in AI answers Citations in AI answers	Same content layer as SEO.
YouTube	OPEN · info	4 Month 3 — informational explainers Views on explainers	Competitor layer empty: 14 of 17 under 1,100 subs.	CRM / Retention	OPEN	4 Month 3 — once players exist Retention; KYC completion	KYC as marketing surface — 2 rivals prove it.
Affiliates	CLOSED · variable pay	3 Month 2 — fixed-fee links only Ref domains; fees signed	s.5(6): fixed fees only. Gate-3 opinion.	CRO	OPEN	4 Month 3 — funnel conversion Reg-to-deposit rate	Funnel instrumentation first.
Content	OPEN	1 Month 1 — the trust layer; no bonus Pages; time on page	Gate-2 opinion is load-bearing here.				

CLOSED — STATED PLAINLY: Influencers — CLOSED · Free-offer promotion — CLOSED (advertising unpaid offerings is prohibited) · Comparison-site paid search — CLOSED · Variable affiliate pay — CLOSED by s.5(6). None are omitted above.

COMPETITIVE OPPORTUNITY

The contest is **split in two** — nobody holds both halves

2.30M

German organic visits / month across the whole licensed set — about 13% of bild.de alone

17 / 20

competitors run measurable paid search — only one (a sportsbook) at real scale

14 / 17

competitor YouTube channels under 1,100 subscribers — empty by rule

7 / 13

samples share one variable-fee review aggregator as their link spine

402 → 0

keywords on the bare domain vs a true organic zero on its slots subdomain — licence ≠ visibility

WHAT COMPETITORS ARE DOING

Brand-led incumbents. StarGames and Wunderino carry branded-share above 99% — traffic from people who already know them, not search discovery.

Paid layer contested but shallow. Only Betano operates at real scale (27 paid pages, 43 keywords, 239 paid traffic) — and Betano is a sportsbook. A slots-only operator cannot match sportsbook ad economics.

Link layer through one aggregator. A variable-fee review site is the shared commercial back-link spine in 7 of 13 samples — a model s.5(6) forbids us to pay. The asymmetry is concrete, not theoretical.

Licence is not visibility. Proved inside one corporate group: a slots subdomain measures a true zero organic while the bare domain carries 402 keywords.

WHERE THE OPENING IS

The keyword split. Loewen Play owns the compliant category terms, JackpotPiraten owns the game titles — nobody holds both. That gap is the opening.

Their biggest engine is closed to us by law. StarGames ranks #1 on two 20,000/mo bonus terms, JackpotPiraten #3 on a 62,000/mo term — forfeited on two independent grounds: the s. 22a(11) wording ban and the prohibition on advertising unpaid offerings. Our play: informational explanation of bonus conditions, dayparted outside 06:00–21:00.

The KYC wall as marketing surface. Novoline advertises a 72-hour window, SlotMagie offers 50 free spins for verification; BingBong publishes live actual-RTP (90.76%) and 6-hour payout time. The transparency mechanic transfers and needs no player volume.

SPINMODO PLAYS **1** own the category / game-title split **2** transparency mechanic: RTP + payout time as trust asset **3** KYC as marketing surface from day one **4** fixed-fee affiliate where rivals run variable **5** be the factual source AI answers cite

Three gates, then every open channel



MONTH 1 Clear the gates

Buy Gate 1 — licence and authorisation confirmation
Legal · Petru · KPI: written confirmation

Buy Gate 2 — information-vs-advertising counsel opinion
Legal · Petru · KPI: written opinion

Buy Gate 3 — s.5(6) fixed-fee boundary opinion
Legal · Petru · KPI: written opinion

Build trust-layer content architecture (not yet published)
Content · Marketing · dep. Gate 2 · KPI: architecture signed off

Brand-protection takedowns for 7 squatter apps
Legal / Brand · Petru · KPI: takedowns filed

MONTH 2 Build and open the open channels

Publish informational content cluster
SEO · Marketing · dep. Gate 2 · KPI: pages live

Launch brand-term paid test, dayparted 21:00–06:00
Paid Search · Marketing · dep. Gate 1 · KPI: CPC, CTR

Launch fixed-fee affiliate programme
Affiliates · Marketing · dep. Gate 3 · KPI: fixed-fee partners signed

Begin AI/GEO structured-data work
AI / GEO · Marketing · dep. content live · KPI: AI citation checks

MONTH 3 Convert and measure

Launch informational YouTube explainers
YouTube · Marketing · dep. Gate 2 · KPI: views, watch time

Instrument the funnel end to end
CRO · Marketing · dep. site live · KPI: registration-to-deposit rate

KYC-explanation content + lifecycle messaging
CRM · Marketing · dep. KYC flow defined · KPI: KYC completion rate

First digital PR data story
Digital PR · Marketing · dep. own measurements · KPI: quality referring domains

BUDGET SCENARIOS

STRATEGIC ASSUMPTION — NOT APPROVED, NOT BENCHMARKED

Low

Legal gates + content only; no paid media. Buys: three counsel opinions, a content cluster, organic foundation — paid waits.

Base

Gates + content + brand-term paid test + fixed-fee affiliates. Adds paid learning and the first link acquisition.

Aggressive

Base + PR, video, AI/GEO workstream, CRO instrumentation. Runs every open channel in parallel from month 2.

THREE GATES BEFORE ANY SPEND: Gate 1 licence capacity · Gate 2 information-vs-advertising · Gate 3 s.5(6) fixed fees — nothing in this deck clears them. · **NOT ESTIMATED:** BLOCKED cost per depositing player; no ROAS, LTV or revenue figure. Absent by rule — no benchmark invented.