

Ticketmaster

Oslo, 1. December 2022

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cc: [post@forbrukertilsynet.no](mailto:post@forbrukertilsynet.no)

## Regarding deceptive design on your website

To whom it may concern,

Forbrukerrådet (The Norwegian Consumer Council) is an independent consumer interest organization that helps consumers and works to influence public authorities and private enterprises in a consumer-friendly direction.

Over many years, the Consumer Council has documented and analyzed the use of deceptive design, which is used to trick consumers into spending more time and money than planned, or to share more personal data than what is in the consumers' own interests. Deceptive design exploits emotional and cognitive biases, for example by exploiting that people have a tendency to assign higher value to products and services that appear to be valued by others, or that appear scarce.

In the past months, the Consumer Council has looked at websites and apps targeted at Norwegian consumers, and that employ deceptive design patterns. The research has predominately been based on tips and suggestions from Norwegian consumers.

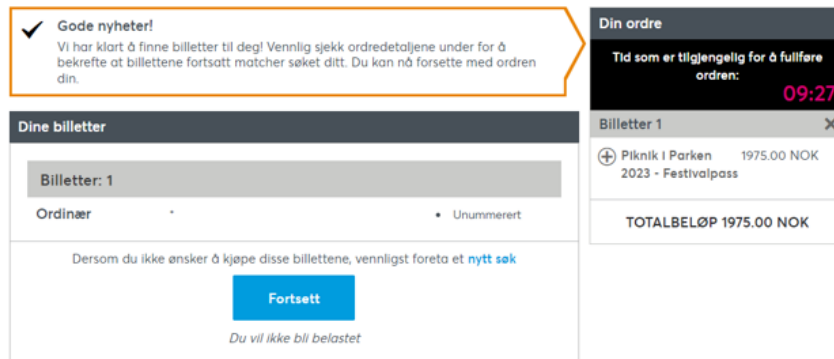
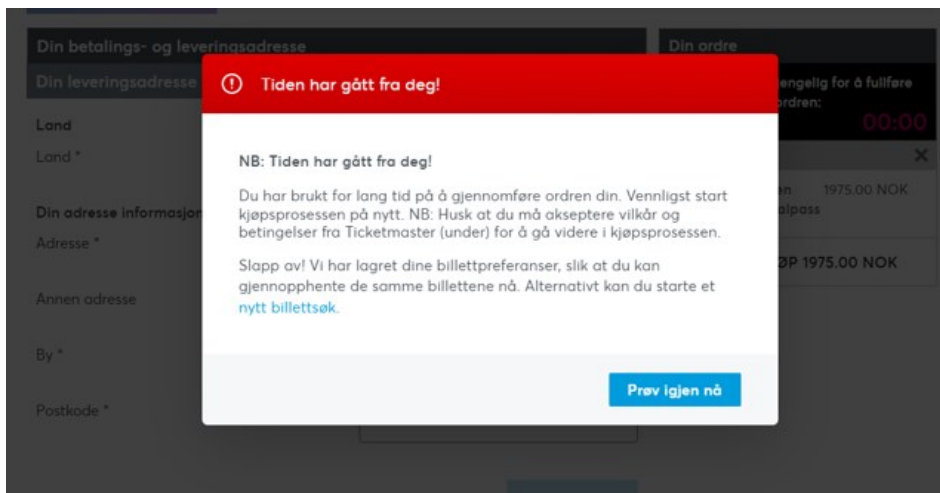
The report containing the results of the research can be found here:

<https://www.forbrukerradet.no/siste-nytt/bruker-design-til-a-lure-oss-for-tid-penger-og-personopplysninger>

Ticketmaster is one of the companies that the Consumer Council believes is using deceptive design, including during the process of purchasing event tickets. When going through the process, the Ticketmaster website makes it appear as if the consumer only has ten minutes to complete their order. If the timer runs out, the ticket choice has been saved, and the consumer can continue the order even though the time limit has passed. Although time limits can facilitate a quicker process of ticket sales when high demand tickets are released, it is less



clear to the Consumer Council why consumers only have ten minutes to complete a ticket purchase even if there seems to be no pressure on the ticket sale from other consumers. Furthermore, the consumer must consider whether they want to purchase ticket insurance, which involves reading long and complicated terms and conditions. The ten-minute time limit makes this effectively impossible.



Additionally, if the consumer does not want to purchase ticket insurance, they must click on “No, I do not want to protect my tickets.” in order to finish a ticket purchase. This deceptive design pattern exploits that people are influenced by how choices are presented, and plays on the consumer already spending a large sum of money to purchase the tickets.



**Billettforsikring - beskytt dine billetter**

Vil du beskytte billettene dine? (valg obligatorisk)

Før du velger forsikringen, vennligst legg merke til at ditt vanlige bosted må være i Norge, Danmark, Finland eller Sverige.

∨ Les mer

**Ja, jeg vil beskytte billettene mine** 110.60 NOK

Ved å velge dette forsikringsproduktet: bekrefter jeg at jeg og alle andre personer på denne bestillingen er bosatt i Norge, Danmark, Finland eller Sverige.  
Bekrefter jeg at jeg har lest og at jeg godtar [Forsikringsproduktets informasjonsdokument \(IPID\)](#) og [Vilkår og betingelser, inkludert Personvernerklæringen](#), levert i et digitalt format.  
Mener jeg at denne forsikringen gir en dekning som passer til mine omstendigheter og behov.

**Nei, jeg vil ikke beskytte billettene mine.**

Finally, the consumer must create a user account to be able to purchase a ticket. This design can be used to make consumers give away more personal data than necessary, both information that must be entered when creating an account, and potentially through subsequent data collection that is connected to the account.

The Consumer Council requests that you go through the aforementioned examples, in addition to other consumer-facing interfaces in your control, and make sure that you no longer use deceptive design. Advice on how to do this can be found in the industry-facing guidelines that are named in the report.

As a part of the Consumer Council mapping of deceptive design, YouGov has conducted a survey of Norwegian Consumers about their attitudes and experiences with deceptive design. The survey shows that consumers react quite negatively to deceptive design, and that many lose trust in businesses that use them. Additionally, many consumers report that they have considered quitting, or actually stopped using websites and apps where they notice the use of deceptive design.

With this letter, the Consumer Council aims to make Ticketmaster aware that many of the types of deceptive designs described in the report are, in the Norwegian Consumer Council's view, in breach of several rules and regulations. The relevant legal provisions are described in the report.



The Norwegian Consumer Authority, which enforces the Marketing Control Act and other consumer law in Norway, is in copy on this letter.

We look forward to hearing back from you.

Regards,

Forbrukerrådet

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