



Transparency Report

According to Art. 15, 24 Digital Services Act

17 February 2024 – 31 December 2024



Introduction

Thank you for your interest in the topics of transparency and security on our Kaufland online marketplace. The following transparency report will inform you about the measures we are taking to comply with the Digital Services Act (DSA) and our approach to dealing with illegal content on our online platform.

The DSA provides a common set of rules for digital intermediation services, i.e., for platforms that provide content from third parties. Such content includes, e.g., posts on social media, but can also be product information from sellers on online marketplaces. The purpose of the law is to counter the spread of misinformation, harmful content, and even illegal or dangerous products on the internet.

This transparency report is prepared in accordance with Regulation (EU) 2022/2065 (the “Digital Services Act” or “DSA”) and covers the period from February 17, 2024, to December 31, 2024. It provides an overview of our content moderation activities, including the use of automated tools, as required of providers of intermediary services under Article 15 and providers of online platforms under Article 24 (1) of the DSA.

About Kaufland Marketplace GmbH

Kaufland Marketplace GmbH operates an online marketplace under various domains such as www.kaufland.de and other top-level domains, as well as within mobile applications (app).

On this online marketplace, Kaufland Marketplace GmbH sells goods to end customers itself and acts as an agent for sales transactions by third-party providers.

End customers can use the online marketplace of Kaufland Marketplace GmbH to browse over 45 million products from more than 11,000 sellers in 6,400 categories.

Precisely for this reason, we want to offer our users a safe and trustworthy shopping experience and support the goals of the European Union through the DSA to strengthen the trust of European consumers and companies in online platforms. The legal basis for our practices is therefore based in particular on the requirements of the DSA.



Content moderation at Kaufland Online Marketplace on our own initiative

As part of operating the Kaufland online marketplace, all users are obligated to comply with applicable laws and regulations. This obligation is already anchored in the terms of use for merchants and end customers.

To this end, we have developed guidelines to prevent legal violations by third parties uploading illegal content and selling unauthorized goods, including prohibited items and counterfeit products. These guidelines are also an integral part of the terms of use and serve to protect consumers, while providing sellers with clarity about what may be sold on the Kaufland online marketplace and under what conditions.

Kaufland Marketplace GmbH enforces these guidelines through various measures and processes. The procedures and instruments serve the purpose of preventing the uploading of illegal content on the one hand, and of reviewing and moderating content on the other. If it is determined that an item or content violates applicable law or the internal guidelines, it will be temporarily blocked or permanently removed. The affected user will receive a corresponding notification.

In addition, measures have been implemented that serve to deter repeated violations of the guidelines. These measures include various sanctions, ranging from the withdrawal of the right to offer certain products to the permanent blocking of a user account.

The various measures and processes in detail:

Proactive content moderation

As already described, the use of only legally compliant content is already an integral part of our contracts with users (see <https://www.kaufland.de/i/agb/haendler-agb/~78nHLI10N2fXXyGsfIkAYr/>). In addition, the sale of certain items via the Kaufland online platform is prohibited (see <https://www.kaufland.de/i/haendler-infobereich/de/infos/verbotene-artikel/~5F7uJH6FsY1x4h0SeGGfgj/>).

To enforce the contractually agreed obligations on the part of users, Kaufland Marketplace GmbH then uses various instruments. Kaufland Marketplace GmbH already defines certain minimum standards that must be met before a product can be offered as part of product data management through so-called mandatory attributes. If the requirements are not met, the offer remains invalid until the user has provided all the necessary information.



In addition, Kaufland Marketplace GmbH has implemented various monitoring measures to ensure that blocked products cannot be offered permanently, and that comparable content can be identified and checked.

Our teams of experts not only focus on processing the actual compliance cases but also analyze trends in the types of violations. This helps to identify potential gaps in the regulations or applications and to continuously improve the existing processes.

Reporting channels & processing of complaints

In addition to the existing reporting channels via our compliance website (see <https://unternehmen.kaufland.de/ueber-kaufland/unsere-werte/compliance.html>) or the contact form (see <https://www.kaufland.de/contact/form?source=report>), an explicit reporting channel for reporting legal violations has also been created as part of the implementation of the legal requirements of the DSA (see <https://www.kaufland.de/contact/form/report>). This is intended to enable targeted reporting of content that violates intellectual property rights, such as trademark, copyright, and design law. It is also possible to report potentially counterfeit goods, incomplete or misleading product information, or, if there are concerns about the product safety of offers.

Since the DSA took effect on February 17, 2024, we have received 883 reports from users through the various channels. All reports were reviewed and processed by the departments responsible. They usually proved to be substantiated and accordingly led to the removal of the corresponding content or offers from our platform. The decision was never reversed.

No out-of-court dispute resolution proceedings were pending during the reporting period.

In addition, no orders were issued by authorities of the member states to Kaufland Marketplace GmbH regarding the Kaufland online marketplace during the reporting period.

Reactive content moderation

As already explained, illegal content is blocked after examination in individual cases in case of doubt. To effectively enforce such blocks, Kaufland Marketplace GmbH uses technical tools that help to permanently remove such content from the online platform and at the same time filter similar content to identify and check comparable content.

In the event of serious violations or repeated offenses, Kaufland Marketplace GmbH also has the option of temporarily or permanently blocking the respective user account



or terminating the contractual relationship with the user. These sanctions are contractually stipulated in the terms of use and are applied in each individual case after weighing all interests.

Support through automated means

The use of technical applications is essential to enforce legal and contractual obligations on the one hand and to ensure a timely and adequate response to reports on the other. The use of algorithms helps to identify suspicious content at an early stage and enable efficient processing by our employees.

Cooperation with authorities

Finally, we work hard to protect users and stakeholders/partners from criminal activities and illegal content. We therefore work closely with the relevant regulatory and law enforcement authorities and support them to the extent permitted by law.

Summary

We want to offer our users a safe and trustworthy shopping experience and support the goals of the European Union through the DSA to strengthen the trust of European consumers and businesses in online platforms.

The measures taken and processes established on our own initiative support the implementation of this goal.

However, it is always crucial that our teams of experts not only focus on maintaining the status quo but are also always entrusted with the further development and optimization of guidelines and processes. Not least, technical solutions are constantly evolving. Accordingly, we continually evaluate which mechanisms can be deployed and further developed.



Appendix Transparency Report February 2025

Report Identification

Name of the service provider	Kaufland Marketplace GmbH
Name of the platform	Kaufland Online-Marketplace
Date of report	17.02.2025
Number of average monthly users of the platform service and retail service	31.834.923

Information on orders

Number of orders received	Total number	0
	Breakdown by member state authority	n/a
	Breakdown by type of illegal content	n/a
Median time of inform of receipt	n/a	
Median time to give effect	n/a	



Information on notices

Number of notices received	Number of notices	Total number	Submitted by trusted flaggers														
	883		0														
	Breakdown by type of illegal content	Animal welfare	Data protection & privacy	Illegal or harmful speech	Intellectual property infringements	Negative effects on civic discourse or elections	Non-consensual behaviour	Pornography or sexualized content	Protection of minors	Risk for public security	Scams and/or fraud	Self-harm	Scope of platform services	Unsafe and/or illegal products	Violence	Other	
	0	10	0	669	0	0	0	0	0	0	0	0	73	0	131		
	Visibility Restriction				Monetary Restriction				Provision of the service			Account Restriction					
	Removed	Disabled	Demoted	Age restricted	Interaction restricted	Labelled	Other	Suspended	Terminated	Other	Suspended	Terminated	Suspended	Terminated			
	650	0	0	0	0	0	233	0	0	0	0	0	0	148			
Action taken pursuant to the notice	863																
Number of action taken based on law	0																
Number of action taken based on general terms and conditions	863																
Number of notices processed by automated means	0																
Median time to take action	7 Days																



Information on own initiative content moderation

Description	The Digital Services Act defines "content moderation" as all activities aimed at recognizing, identifying, and removing illegal content or information that does not comply with our guidelines and is provided by third parties (such as sellers on our online marketplace). This moderation is understood as a reactive measure after the publication of content. At Kaufland, we place great importance on providing our users with safe, responsible, and compliant content. Therefore, we have developed clear and comprehensive guidelines (e.g., regarding product safety and intellectual property) that any third party wishing to sell products on Kaufland must accept and adhere to. Our procedures for reviewing and approving content are designed to ensure that all legal requirements are fulfilled for all products and information we offer. We take this responsibility seriously and have established a robust system for reviewing and approving content. The basis for this is the design of our product data system. We also place a special focus on the processing of complaints. Kaufland's subsequent content moderation therefore mainly focuses on reviews reported to us (e.g., by customers or partners). If any irregularities are found, these products are deactivated.														
Action taken pursuant own initiative moderation	Visibility Restriction					Monetary Restriction			Provision of the services		Account Restriction				
	Removed	Disabled	Demoted	Age restricted	Interaction restricted	Interaction restricted	Labelled	Other	Suspended	Terminated	Other	Suspended	Terminated	Suspended	Terminated
	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Number of action taken based on law	0														
Number of action taken based on general terms and conditions	0														
Number of items moderated by automated means	0														
Number of items moderated by content moderators	0														

Internal complaints handling/out-of-court settlement

Number of complaints submitted through internal complaints handling system	0		
Basis for complaints	Procedural complaints	Substantive complaint in illegality/incompatibility	Restriction not diligent/objective/proportionate
	0	0	0
Decisions taken pursuant to complaint	Decision upheld	Decision reversed	
	0	0	
Median time to take decision	days		
Number of complaints submitted to out-of-court dispute settlement bodies	0		



Suspensions imposed on repeated offenders

Number of suspension enacted for the provision of manifestly illegal content	148
Number of suspension enacted for the provision of manifestly unfounded notices	0
Number of suspension enacted for the provision of manifestly unfounded complaints	0

Use of automated means for content moderation

Summary of the use made of automated means for the purpose of content moderation	Kaufland does not rely on sole automated means of for content moderation
Qualitative description of the automated means	n/a
Specification of the precise purposes to apply automated means	n/a
Safeguards applied to the use of automated means	n/a

Human resources dedicated to content moderation

Number of moderators employed	Total number of part-time-moderators	11				
	Full-time equivalent	10				
	Breakdown by member state	AT	CZ	DE	PL	SK
		n/a	n/a	n/a	n/a	n/a
Qualifications of content moderators	Commercial training or studies with a focus on BLW; relevant professional experience in E-commerce or product data					
Linguistic expertise of content moderators	n/a					
Training given to content moderators	Internal knowledge pages, instructions for content moderation and advice form in-house lawyers					
Support given to content moderators	Advice from other specialist departments, e.g. legal department, compliance or quality management					