

Bilbasen

Regulation (EU) 2022/2065 Digital Services Act Transparency Report for Bilbasen

Reporting period 17. February 2025 - 30. June 2025

1. Introduction

This transparency report covers the reporting period 17 February 2025 - 30 June 2025 and provides details on content moderation, notices received, and enforcement actions taken for Bilbasen in compliance with the Digital Services Act (DSA). The report has been prepared in accordance with the requirements set out in the DSA, based on the data and information currently available to us for the reporting period.

Bilbasen is committed to providing a safe, trustworthy and user-friendly platform for car buyers and sellers in Denmark and we have taken important steps to protect users, limit misuse, and comply with the requirements of the DSA.

For example, all private users who wish to create listings on Bilbasen are required to verify their identity via MitID. This serves as a foundational safeguard against impersonation, fraudulent listings, and repeated misuse. MitID verification ensures that every seller is uniquely tied to a verified Danish identity, and significantly limits the ability of malicious actors to operate anonymously on the platform. This policy complements Bilbasen's automated and manual moderation efforts by helping ensure that only traceable users can create listings.

2. Orders from Member States

DSA Article 15(1)(a)

During the current reporting period, Bilbasen has not received any orders from Member States requesting action on content or other service-related matters.

3. Notices Received

DSA Article 15(1)(b) cf. Article 16

Bilbasen allows users to report listings they believe to be illegal, misleading or in breach of the platform's Terms & Conditions. Notices can be submitted through a contact form directly associated with the listing.

Each notice is reviewed manually by Bilbasen staff. If the listing is found to contain clearly misleading information, violate applicable law, or present suspicious patterns action can be taken either by restricting visibility, contacting the seller, or removing the listing.

Bilbasen received 137 notices on possible illegal content during the reporting period. After reviewing the content, Bilbasen has registered action taken on 25 of these.

Most of the notices received concerned “wrong information in the listing” which is something Bilbasen does not take action on.

Notices from Trusted Flaggers

Bilbasen has not received notices from Trusted Flaggers during this period. In accordance with DSA Article 22, notices submitted by Trusted Flaggers in the future will be prioritised and flagged internally to ensure these notices are decided upon without undue delay.

4. Content Moderation Initiated by Bilbasen

DSA Article 15(1)(c)

During the reporting period, there was no content moderation initiated by Bilbasen.

Bilbasen implements a range of measures to detect and act upon content or behaviour that may be illegal, misleading, or in breach of our platform Terms & Conditions.

Bilbasen uses an automated turnstile component to detect bot-like behaviour. This system monitors access patterns and restricts access to specific features. For example, the tool may suspend the user's possibility to view private phone numbers.

In addition, Bilbasen operates a rule-based blacklist scoring system that monitors user behaviour. If a user reaches a total score of 10 points or more, the account is automatically restricted. This system only operates for private user accounts on Bilbasen. The scoring system is based on predefined indicators such as:

- Unusual or high-frequency posting activity
- Use of proxies or other technical anomalies
- Email characteristics, including disposable domains and patterns linked to previous fraud cases

If the score threshold is exceeded, the account is automatically blocked. In cases of confirmed or suspected fraud, Bilbasen may also block users manually, regardless of their score.

To minimise the risk of wrongful account restrictions, Bilbasen always conducts a manual review of content where the automated tool detects a possible problematic account.

5. Complaints Through Internal Complaint-Handling System

DSA Article 15(1)(d)

Bilbasen did not receive any complaints on decisions taken after the receipt of notices according to DSA Article 16, regarding possible illegal content.

All users can submit notices if they believe content violates our Terms & Conditions or is illegal, according with Article 16 of the DSA, through our notice system. When a notice is received it is always assessed and it is determined either to take action or to dismiss the report. All users affected by these decisions may file complaints to Bilbasen's customer service to question or challenge a decision.

In these situations our qualified employees always do a new review of the case and, where appropriate, reinstate listings or reactivate user access.

6. Use of Automated Content Moderation Tools

DSA Article 15(1)(e)

As described in Section 4, Bilbasen uses two distinct automated systems to help prevent abuse and support moderation efforts:

- a turnstile system that detects bot-like browsing behaviour and restricts access to specific features (such as viewing phone numbers in listings) when abnormal patterns are detected
- a rule-based blacklist system that monitors user behaviour and email characteristics, assigning a cumulative risk score. Accounts that reach a score of 10 or more are automatically restricted.

The turnstile and blacklist systems are built on static rules and thresholds set by Bilbasen. The system is deterministic and not probabilistic. To minimise the risk of errors and wrongful decisions, Bilbasen has the following safeguards:

- Daily manual review of all accounts affected by automated restrictions
- Customer support availability, allowing users to report errors or request reinstatement
- No content removal or enforcement action is executed based solely on automation without human oversight

These systems are designed to limit exposure to fraudulent actors and ensure a safe environment for users, while maintaining manual control over all moderation decisions.

7. Out-of-Court Dispute Resolution

DSA Article 24(1)(a) cf. Article 21

Bilbasen provides users, individuals, and entities that do not agree with relevant enforcement decisions the right to challenge the decision either in a relevant court or via referral of the decision to a certified dispute settlement body. As of 30 June 2025, DBA had not received any disputes from certified out-of-court settlement bodies pursuant to DSA Article 21.

8. Measures Against Misuse

DSA Article 24 (1) (b) cf. Article 23

Misuse by Users Providing Illegal Content - DSA Article 23 (1)

If Bilbasen experiences that a user repeatedly provides manifestly illegal content to the platform, Bilbasen removes the listing from the platform. The user always receives a warning about potential suspension of the account. If further violations occur, the user profile may be suspended. If the user agrees to comply moving forward, the profile is reactivated. During the reporting period, no user profiles were restricted due to misuse of providing illegal content.

Misuse by Users Submitting Unfounded Notices - DSA Article 23 (2)

If Bilbasen experiences that a user repeatedly provides notices/reports that are manifestly unfounded, we do a manual control of the user profile and reports before taking a decision on further processing. If the suspicion is correct, we always send the user a warning to give the possibility to stop the misuse. If this is not followed up on, we either restrict the user's ability to submit further notices or suspend the user's reporting privileges. During the reporting period, no users were restricted due to misuse of the notice mechanisms.

Misuse by Users Filing Unfounded Complaints - DSA Article 23 (2)

If Bilbasen experiences that a user repeatedly provides complaints on decisions taken that are manifestly unfounded, we do a manual control of the user profile and their reports before taking a decision on further processing. If the suspicion is correct, we always send the user a warning to give the possibility to stop the misuse. If this is not followed up on, we either restrict the user's ability to submit further notices or suspend the user's reporting privileges. During the reporting period, no users were restricted due to misuse of complaint mechanisms.

9. Conclusion

Bilbasen is committed to providing a safe, trustworthy and user-friendly platform for car buyers and sellers in Denmark and we have taken important steps to protect users, limit misuse, and comply with the requirements of the DSA.

This report reflects our efforts during the reporting period to identify and mitigate risks, improve transparency, and respond to user concerns. We are actively working to always improve our internal processes to make sure our service remains of high quality to our users.