



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

Reporting period 17. February 2024 - 16. February 2025

## **Transparency Report**

**In accordance with the Digital Services Act (DSA), Articles 15 and 24**

# **1. Introduction**

This transparency report covers the reporting period 17 February 2024 - 16 February 2025, and provides details on content moderation, notices received, and enforcement actions taken for DBA 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 available to us for the reporting period.

On 4 February 2025, DBA underwent a significant internal transition that fundamentally changed our workflows, data classification, moderation logic, and internal tooling. As a result, moderation data generated after this date was structured and processed in a fundamentally different manner.

To maintain coherence, comparability, and clarity in this transparency report, we have excluded moderation data collected between 4 February and 16 February 2025. Including data from this transitional period would have introduced inconsistencies and reduced the meaningfulness of aggregated figures.

## **DBA's Work with Trust and Safety**

At DBA, ensuring a safe and trustworthy marketplace is our top priority. We take a proactive approach to detecting fraudulent activities, preventing scams, and protecting our users. Through a combination of advanced security systems, user reporting, and collaboration with authorities, we continuously strengthen our platform's safety.

We implement, in particular, the following key trust and safety measures:

### **1. Advanced Security and Fraud Prevention Systems**

- Users play an essential role by reporting suspicious ads or fraudulent buyers, which are given top priority and reviewed within hours.
- A dedicated support and security team works seven days a week to investigate user reports and monitor unusual activity.
- We also use technical analysis and manual moderation to review suspicious listings and remove those that violate our policies.

### **2. Strict User Verification and Account Controls**

- If a seller appears suspicious, we suspend their profile and only reopen it after additional identity verification, such as MitID validation or proof of purchase.
- Certain sellers must verify their identity through MitID before posting ads. For example, we implemented mandatory MitID in selected high-risk categories, regardless of account age (e.g. smartphones, concert tickets, race dogs). We

also implemented conditional MitID for newer accounts in other sensitive categories (e.g. sublets, vouchers, certain electronics).

- Users can filter listings to only see those from MitID-verified sellers for enhanced security.
- Every profile displays a registration date, allowing buyers to see how long a seller has been active on DBA.
- In the chat-communication (Spørgsmål & Svar), buyers are notified when they are communicating with a new and non-MitID-verified user.

### 3. User Education and Safe Trading Guidelines

- We provide detailed guidelines on safe trading, helping users recognize scams and protect their personal information.
- Our help pages inform users about emerging fraud risks.

### 4. Collaboration with Authorities

- DBA works closely with law enforcement agencies and follows their recommendations to prevent and combat fraud.
- We ensure that police receive relevant user information quickly when needed for fraud investigations.

Through these measures, DBA continuously enhances its security efforts, creating a trusted and reliable platform for buyers and sellers.

---

## 2. Orders from Member States

### DSA Article 15(1)(a)

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

---

## 3. Notices Received

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

DBA provides a system that allows all users to report content they believe to be illegal or violates DBA's Term & Conditions. Upon receiving a notice, we promptly assess whether the content is illegal or violates our Terms & Conditions. Users are then informed of our decision.

In the reporting period, all user notices related to illegal content or violation of DBA's Terms and Conditions (excluding notices regarding suspected fraud) have been assessed within a median handling time of 9.14 hours. All user notices related to suspected fraud are directed to a high-priority inbox. This inbox is manually reviewed approximately every hour from 08:00 to 22:00 daily, ensuring that the most high-risk notices are continuously assessed by a dedicated team within a few hours. The internal dedicated team doing this control is trained to identify illegal content in breach of any applicable Danish or EU law, or violations of DBA's Terms & Conditions or advertising rules. All our staff undergoes a thorough onboarding and continuously upskilling to ensure being updated on rules and changes.

During the reporting period, DBA received a total of 46 380 notices alleging illegal content. Action was taken on a total of 40 185. All actions taken were based on legal grounds and none on violation of DBA's Terms & Conditions.

### **Notices from Trusted Flaggers**

DBA has not received notices from Trusted Flaggers during the reporting 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 DBA**

### **DSA Article 15(1)(c)**

DBA uses a rule-based automated detection system to scrutinise content on our platform and to support our manual teams in detecting possible illegal content. The technology is trained to take action and react on multiple parameters of pre-defined behavioural signals and user account characteristics rather than content-level analysis.

Automated tools are used to primarily react to the following:

- Certain account activity (e.g. posting frequency such as rapid multi-posting, IP origin from banned countries, proxy detection)
- System blacklists (e.g. blocked emails, phone numbers)
- Structural content features (e.g. homoglyph usage or repeated patterns)
- Registration metadata (e.g. account age, MitID status)

The automated system uses a simple scoring model, based on detected content. Accounts reaching a score of 6 or more are automatically restricted. This automated measure removes all listings and messages from the user's account and blocks the user's access to the platform. Conversations involving such accounts are also removed from the other user's chat view, and replaced with a message stating that the user has been excluded.

While the system is effective at identifying certain behavioural patterns, it does not involve machine learning, AI, natural language processing, or contextual interpretation. As such, there are no formal error rate metrics or precision indicators available. Verified MitID accounts are automatically given a score reduction (-100), reducing the likelihood of false positives. These validated profiles are not automatically blocked. Instead, they are still subject to investigation through a manual review process carried out by the security team.

To minimise the risk of wrongful account restrictions, DBA always conducts a manual review of all content where the automated tool detects a possible problematic advert. This process is known as DBA's "Fraud Verification" process. Each day, all user accounts affected by automated fraud restrictions are reviewed by staff to identify and reverse any erroneous closures. In addition, users can always contact customer support to challenge a restriction, in case their profile is not already cleared through the daily review process.

The internal dedicated team doing this Fraud Verification, is trained to identify illegal content in breach of any applicable Danish or EU law, or violations of DBA's Terms & Conditions or advertising rules. All our staff undergoes a thorough onboarding and continuously upskilling to ensure being updated on rules and changes.

If one or more of the suspected issues are met, content is either deactivated or deleted, depending on the severity of the issue. User accounts are restricted when necessary, especially in cases involving suspected fraud.

---

## **5. Complaints Through Internal Complaint-Handling System**

### **DSA Article 15(1)(d)**

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, we assess the content and determine whether to take action or dismiss the notice. If a notice is dismissed, the submitter may request a second review. Similarly, if action is taken, the affected user may file a complaint.

On the decisions taken after the receipt of notices according to DSA Article 16, DBA received a total of 333 complaints during the reporting period.

## 6. Use of Automated Content Moderation Tools

### **DSA Article 15(1)(e)**

As outlined in Section 4, DBA uses automated tools for our own content moderation to ensure that our platform has high quality and to provide a safe marketplace to our users. Other than the automated tools described above in section 4, DBA only uses manual tools in content moderation.

---

## 7. Out-of-Court Dispute Resolution

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

DBA 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 16 February 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 DBA experiences that a user repeatedly provides manifestly illegal content to the platform, DBA removes the listing from the platform.

When a listing is removed due to illegal content, the user is notified via email with a clear explanation that the listing has been taken down due to a legal violation. If such incidents occur repeatedly, the seller receives a warning about potential suspension of their account. If further violations occur, the user profile is suspended and the user is logged out from all devices. Upon attempting to log in, the user sees a message stating that the profile has been suspended, along with contact details for our Customer Support team. DBA's Customer Support team engages in a dialogue with the user to explain the applicable policies. If the user agrees to comply moving forward, the profile is reactivated. However, if the user violates the policy again, the profile is suspended for six months without further warnings.

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

If DBA experiences that a user repeatedly provides notices/reports that are manifestly unfounded, we carry out a manual control of the user profile and the reports before taking a decision on further processing. If the suspicion is correct, we 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 we suspend the user's reporting privileges. During the reporting period, there were no users that were restricted due to misuse of the notice mechanisms.

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

If DBA experiences that a user repeatedly provides complaints on decisions taken that are manifestly unfounded, we carry out a manual control of the user profile and reports before taking a decision on further processing. If the suspicion is correct, we 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 complaints or we suspend the user's reporting privileges. During the reporting period, there were no users that were restricted due to misuse of complaint mechanisms.

---

## **9. Conclusion**

At DBA, we are committed to maintaining a safe and trustworthy marketplace for all users. We achieve this through a combination of fraud detection systems, strict identity verification measures, user education initiatives, and close cooperation with law enforcement. Our dedicated teams work daily to monitor activity, handle reports swiftly, and continuously adapt our systems to emerging risks. By combining automation with human oversight, we ensure fair and effective moderation that protects our users while respecting their rights. Through these efforts, DBA continues to provide a reliable and secure platform for buyers and sellers across Denmark.

---