



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

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 Tori 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.

In February - May 2024, Tori 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 before moving to a new system starting on 28 February 2024 (i.e. data between 17/02/24 and 28/02/24). Including data from before the transition period would have introduced inconsistencies and reduced the meaningfulness of aggregated figures.

At Tori, ensuring a safe and trustworthy marketplace is our top priority. We take a proactive approach to detecting illegal 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.

To enhance fraud prevention and user security, Tori has implemented several key trust and safety measures:

1. Advanced Security and Fraud Prevention Systems

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

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 eID validation or proof of purchase.
- Certain sellers must verify their identity through eID 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). This measure has significantly reduced fraudulent and illegal activity. We also implemented conditional MitID for newer accounts in other sensitive categories (e.g. sublets, vouchers, certain electronics). We also introduced mandatory eID to contact advertisers who posted ads in the want-to-buy category.

- Users can filter listings to only see those from eID-verified sellers for enhanced security.
- Every profile displays a registration date, allowing buyers to see how long a seller has been active on Tori.
- If we detect a fraudulent user, and see that this user has been in contact with other users via the Tori-messaging platform, buyers and sellers are normally notified that they have been communicating with a suspicious user.

3. User Education and Safe Trading Guidelines

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

4. Blocking of Misuse and Terms Violations

- If a user violates the Terms & Conditions or misuses the service, Tori may restrict their access by preventing the associated eID from being used again on the platform.

5. Prevention of Email-Based Fraud:

- To prevent scams based on guessing users' email addresses from their usernames, Tori has taken active steps to block such fraudulent activities.

6. Collaboration with Authorities

- Tori maintains ongoing cooperation with law enforcement agencies and industry stakeholders to ensure a secure marketplace.
- Tori 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, Tori continuously enhances its security efforts, creating a trusted and reliable platform for buyers and sellers. These proactive and preventive actions have significantly improved platform security and strengthened user trust.

2. Orders from Member States

DSA Article 15(1)(a)

During the current reporting period, Tori 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

Tori provides a system that allows users to report content they believe to be illegal. On every listing page there is a report button easily available. In addition the user will always have the opportunity to make direct contact with Tori's customer service. Upon receiving a notice, Tori has dedicated employees who will prioritise to review the content of the advertisement, to assess whether the content is illegal and/or violates our Terms & Conditions. In addition, the user account is reviewed in its entirety, not just the reported content, to detect potential patterns of misuse. After review users will be informed of the decision on the notice received. If the content is decided as illegal or to violate the Terms & Conditions, the content will be removed and the owner of the content will be informed about the decision.

In the reporting period Tori received/registered 112 819 notices on alleged illegal content or content being in violation of Tori Terms & Conditions. On these notices, Tori registered 53 215 actions taken in the same period, while 59 604 of the reports led to no action. All reports were taken manually and the median response time to take action was 34 minutes.

Notices from Trusted Flaggers

Tori 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 Tori

DSA Article 15(1)(c)

Tori uses both manual and automated tools for content moderation on our own initiative to maintain a safe and compliant platform. These tools are applied to both listings and messaging functions on our platform.

Over the reporting period, we recorded over 14 million automated checks and 963 085 manual checks. Actions were taken based on illegal content in 5084 cases, whereas actions were taken based on Terms & Conditions violations in 313 630 cases.

Proactive Moderation Before Publishing

During the current reporting period, no content moderation has been performed on our own initiative *after* a listing has been published. Instead, we aim to detect and handle any issues *before* a listing or message goes live. Every listing and message undergoes automated or manual review before it is published on the platform.

How Automated Moderation Works

Before publication, all listings and messages are assessed by our automated tools. These tools are trained to respond based on various parameters, including:

- Keyword lists
- User profile history
- Suspicious behavior or actions (as defined by internal policies and prompts designed specifically for the automated system)
- Ad hoc reviews

The automated system will either:

- Approve the listing for publication
- Send it to manual review
- Automatically send a user to EID quarantine

For messages only, some messages are automatically stopped from going through the system.

Manual Review Process

If the automated tools flag a listing or a message but the violation is not certain, it is sent to a dedicated team for manual review. This helps reduce the risk of incorrect rejections or account restrictions. The moderation team is trained to identify illegal content according to Finnish and EU law, as well as violations of Tori's Terms & Conditions and listing rules.

Quality Assurance and Continuous Improvement

All moderation staff receive thorough onboarding and continuous training to stay up to date with rules and policy changes. In addition, a separate quality assurance team regularly reviews both automated and manual moderation decisions. They also assess listings ad hoc to:

- Improve rules and prompts for the automated tools
- Provide feedback to moderators
- Ensure high accuracy and alignment with current legal and platform requirements

Our goal is to maintain a high standard in all moderation decisions and continuously adapt to changes and development.

5. Complaints Through Internal Complaint-Handling System

DSA Article 15(1)(d)

As noted above, 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.

Tori has not registered information about complaints in the reporting period and is thus unable to provide meaningful statistics for this report.

6. Use of Automated Content Moderation Tools

DSA Article 15(1)(e)

As outlined in Section 4, Tori 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, Tori only uses manual tools in content moderation.

7. Out-of-Court Dispute Resolution

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

Tori will provide 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 the 16th of February 2025 Tori 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 Tori experiences that a user repeatedly provides manifestly illegal content to the platform, Tori removes the listing from the platform.

When a listing is removed due to illegal content, the user is notified usually 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 account is suspended and the user is logged out from all devices. Upon attempting to log in, the user sees a message stating that the account has been suspended, along with contact details for our Customer Support team. Tori'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 account is suspended for at least six months without further warnings.

Over the reporting period, Tori registered the following number of suspensions:

Reason	Number of Suspensions
Rule violation	419
Scam / Fake user	13567
Threats towards platform employee	7
Inappropriate content / behaviour	920
Fraud	13319
Account Takeover	1038
Other	16
Total	29 286

Misuse by Users Submitting Unfounded Notices

If Tori experiences that a user repeatedly provides notices/reports that are manifestly unfounded, we have the following routines in accordance with DSA Article 23 (2).

- Issue warnings
- Suspend the user

No user account was suspended in the period due to misuse of the notice system in the reporting period.

Misuse by Users Filing Unfounded Complaints

If Tori experiences that a user repeatedly provides complaints on decisions taken that are manifestly unfounded, we have the following routines in accordance with DSA Article 23 (2)

- Issue warnings
- Suspend the user from reporting complaints
- Suspend the user

No user account was restricted or suspended due to misuse of complaint mechanisms in the reporting period.

9. Conclusion

Tori has seen clear long-term success in its efforts to improve safety and proactively prevent the spread of illegal content on the platform.

The mandatory BankID verification for publishing listings for risk categories and use of the messaging platform has produced very positive results, significantly reducing abuse and fraud. Additionally, the ability to suspend the user after violations has further strengthened our preventive measures.

While we are pleased with this progress, there is still work to be done. Even a single case of fraud is one too many, which is why we aim for zero tolerance by continuously developing our fraud prevention strategies. Close cooperation with authorities and industry players ensures we stay ahead of emerging threats.

We will continue to act proactively and decisively to keep the platform safe and trustworthy for all users.
