

# Digital Services Act (DSA): Wallapop Transparency Report

February 2024 - December 2024



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#### Introduction

Wallapop is an online marketplace that connects a community of people across Spain, Italy, and Portugal, offering a seamless way to buy and sell second-hand and unique items. With a strong commitment to sustainability, opportunity, and accessibility, Wallapop promotes a more conscious and circular economy by extending the life of pre-owned or unique goods. Since its launch in 2013, we have worked hard to revolutionize the reusing market, with our community generating more than 640 million listings and driving significant environmental impact. In 2023 alone, Wallapop users helped save 524,000 tons of CO<sub>2</sub> emissions, 19.7 billion liters of water, and 22,700 tons of plastic.

Both this qualitative report and its quantitative counterpart (which is published jointly and hereinafter referred to as the "Quantitative Report") have been meticulously prepared to meet the DSA's Transparency Reporting requirements. The Quantitative Report can be found at <a href="this link">this link</a> and in the Help Center under the Security Center section. The information is compiled in accordance with Regulation (EU) 2022/2065 (the "Digital Services Act" or "DSA"). It includes the data required by the DSA alongside descriptions of the controls and processes we invest in to ensure our marketplace is safe for users and brands.

We are proud of the progress we have made in advancing compliance and preventing content that is illegal or violates our Terms and Conditions from being available in our marketplace. This has required significant resources from our dedicated team, and partnerships that we have built with rights owners, government agencies, law enforcement, and many others.

This report marks the first submission in line with DSA obligations, showcasing Wallapop's dedication to user safety spanning 17 February 2024 to 31 December 2024.



Recognizing that DSA Transparency Reporting is based on ongoing refinement, we are committed to keeping our marketplace trustworthy while looking for ways to improve our transparency efforts. While we believe we have made a great deal of progress, we continue to invest in enhancing our shopping and selling experience.

### Summary

Our Transparency Report, covering the period from 17 February 2024 to 31 December 2024, reflects our commitment to comply with the Digital Services Act and our dedication to maintaining a safe and trustworthy marketplace. We have enhanced existing and implemented new reporting mechanisms ensuring that concerns are addressed effectively.

Additionally, we have strengthened our content moderation efforts through a combination of automated tools and human review. Our proactive measures resulted in over 7.4 million enforcement actions, helping to remove illegal or non-compliant content. We have also enhanced our internal complaint-handling mechanisms, ensuring fair and impartial appeal processes for users.

Our enforcement actions range from content restrictions to account suspensions, depending on the severity of violations. We continue to refine our policies and systems to align with evolving regulations and user safety requirements.

# Our reporting mechanisms

Community reports, Notice and Action mechanisms, Brand Reports, and Official Authorities Requests

There are several ways in which reports can be made through Wallapop. Users can make Community Reports regarding content or user behaviour against our Terms and Conditions through the platform. Additionally we have a channel designated specifically for brands and their representatives to submit claims and removal requests regarding intellectual property or other related infringements for our dedicated team to review.

In line with Article 16 of the DSA, we have implemented a Notice and Action Mechanism which allows any individual or entity to report content that they believe may violate European law and the laws of individual member states. Throughout this time frame, Wallapop received 1,114 notices, of which the median time to get a response was 22 hours. Further details can be seen in tab 3 of the Quantitative Report.



Additionally, in line with Articles 9 and 10 of the DSA, we have received from official authorities a total of 3,810 orders to act against illegal content or to provide information. In the table dedicated to official authorities' data, Spain, Italy, and Portugal are highlighted as our main countries, as they are the primary regions where Wallapop operates. Requests from official authorities in all other EU countries are grouped under the category 'Other'. Refer to tab 2 of the Quantitative Report for further details.

The three forms can be found in our help center under the Security Center section. We believe in making it as easy as possible for our users to bring to our attention any concerns they may have about the content they encounter on our platform. Once we receive a notification it will be assigned to and reviewed by members of our expert teams. If the content is found to violate local laws or Terms and Conditions standards, then the content is removed from our platform.

#### Our own initiative moderation and controls

Through continuous refinement of policies and processes, Wallapop has set in place a comprehensive set of policies contained within our Community Guidelines which form the foundation of our content moderation efforts. These policies prohibit illegal content and conduct as well as other harmful behaviour and aim to create a safe environment on our platform. We are committed to continuously updating and improving our policies to provide the most effective and fair rules to our users, as well as to reflect evolving regulatory requirements.

Our content moderation systems blend automated and human review processes. Our own initiative controls use advanced machine learning techniques and automation to monitor different aspects of our platform for potentially fraudulent, infringing, inauthentic, non-compliant, unsafe products or content against our Terms and Conditions to maintain a trustworthy experience and send some to our human moderators for review. Our content moderation systems include controls that function through rules where we employ keyword-based, rule-based control, and image detection algorithms and machine learning models that are continuously run against platform content.

These controls aim to prevent non-compliant products from being listed or flagged for Wallapop's expert moderators to review. In the relevant reporting period, we took over 7.4 million actions on our own initiative, which included actions taken through the proactive content moderation tools we have built to remove illegal content as well as those related to policy violations or other types of non-illegal content. Due to a technical error, all restrictions issued under the "Images" policy were mistakenly categorized under "Minor Protection" through the API. In reality, these bans were solely related to the use of third-party images and did not involve minors. This was resolved as soon as it was detected and further QA has been implemented to ensure accuracy. Additional details on our own initiative content moderation can be found in tab 4 of the Quantitative Report.



It is important to note that the numbers presented here represent the actions initially quantified by our system and do not account for any subsequent reversals by our QA team, appeals, or other mechanisms.

Our content moderation teams and agents are composed of experts from various fields. Our technology engineers develop and continuously enhance our tools, while our policy and platform governance team includes specialists in fraud prevention, product safety and compliance, intellectual property rights, and data privacy. This team is further supported by a dedicated task force that monitors emerging trends to proactively address new challenges. Additionally, to support continuous skill development and knowledge expansion, each member has access to a dedicated learning and development budget, allowing them to deepen their expertise in relevant topics.

To maintain high accuracy and efficiency in content moderation, our teams undergo continuous training, staying up to date with industry standards, evolving risk areas, and any policy changes. These trainings include regular quality assurance reviews to ensure consistent application of our moderation policies. Furthermore, we provide specialized training for agents focusing on specific areas. For example, our team in charge of reviewing brand removal requests receive specialized training in topics such as intellectual property rights, trademark infringements, etc.

We also engage in a continuous feedback loop, incorporating insights from moderators, technology teams, and external stakeholders to refine our processes, enhance detection capabilities, and improve policy enforcement. This iterative approach allows us to adapt quickly to emerging risks and maintain a high standard of content moderation.

# Automated means for the purpose of content moderation

The use of automated systems is designed to mitigate risks without unnecessarily restricting the service. To ensure fairness and accuracy, metrics regarding automated decisions are monitored by human reviewers. Automated measures are only applied after rigorous testing to ensure high accuracy, contributing to a safe and compliant online shopping environment.

We leverage advanced risk analysis tools to detect patterns indicating scams or suspicious activities, such as account takeovers, bot activity, or fake account creation. Our team oversees the final decisions, ensuring false positives are reviewed, and tools are continuously retrained for greater precision. This hybrid approach balances efficiency with accuracy in enforcing platform rules.

Content moderation rules are automated only when they exceed 99% accuracy, always with human oversight, continuous monitoring, and alerts that detect



deviations from expected accuracy levels. Many automated measures prevent infringing content from being published in the first place. The error rate shown in tab 7 of the Quantitative Report is for users suspended from the platform by automated means.

Our automated moderation technology ensures compliance with community guidelines and legal requirements, maintaining a safe environment for users. We continuously refine these systems, using error cases to improve accuracy in an iterative process. Additionally, our appeals system allows users to challenge moderation decisions, with human reviewers assessing cases where automation may have misinterpreted content.

# Our internal complaint-handling mechanisms

To minimize unintended restrictions, fairness and accuracy, we have implemented an appeals system that enables users to raise concerns about potential moderation errors. This system allows for the review of moderation decisions by a different team than the one making the moderation decisions to ensure impartiality and consistency in the review process. By involving a separate team, we minimize the risk of bias and ensure that appeals are evaluated objectively.

The team handling appeals is specifically trained in our policies allowing them to assess cases objectively and reinstate content in case the appeal is accepted.

#### Our enforcement actions

To maintain a safe and compliant marketplace, Wallapop enforces its policies through different measures depending on the nature and severity of the violation. Our enforcement actions fall into two main categories, as shown in table 4 of the Quantitative Report.

'Visibility Restriction Disable' refers to listing removals from the platform, while 'Account Restriction Suspension' applies to suspended users for repeated or serious violations. Repeated violations of listing policies may result in account suspension.

#### Conclusions

We are committed to maintaining a trustworthy and safe marketplace for our users. Our efforts in content moderation, combined with our reporting mechanisms and appeals system, reflect our dedication to compliance with the DSA and our ongoing commitment to user safety. While we have made significant progress, we recognize the need for continuous improvement and will keep refining our processes to enhance transparency and effectiveness. We remain focused on providing a secure and enjoyable experience for all Wallapop users and the community.