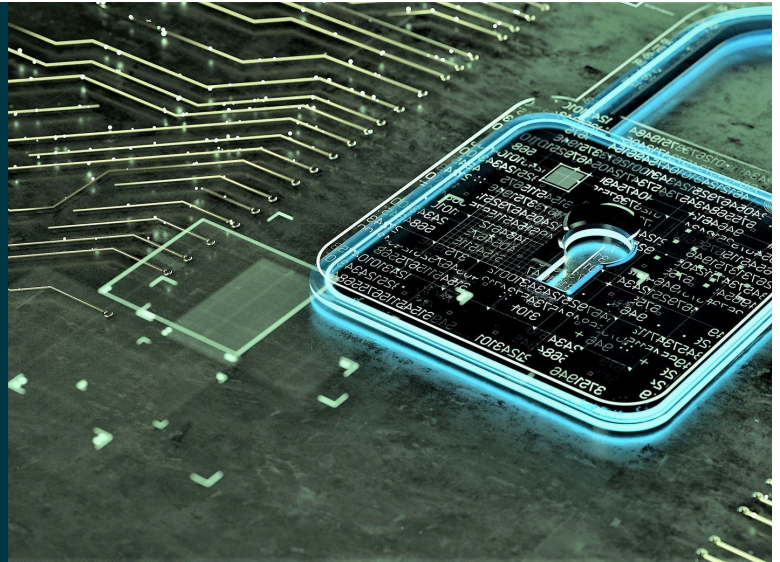


Upcoming Reporting Obligations Under the EU Digital Services Act



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ALERTS

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Services subject to the EU's Digital Services Act (DSA) will be required to publish their annual transparency report by February 16, 2025. This includes providers of hosting services, online platforms, very large online platforms (VLOP), and very large online search engines (VLOSE). The extent of the information required to be disclosed varies depending on the nature of the service in question. This alert outlines the key requirements and steps that companies should take now.

Reporting Requirements for Intermediary Services

Services that host or otherwise transmit content on behalf of users are required to publish figures covering:

- **Orders from EU authorities.** The DSA provides that EU authorities (including administrative and judicial authorities) may serve orders on regulated services to act against illegal content or otherwise provide information. Covered services must disclose the number of these requests that have been received.
- **User reports.** The DSA also requires regulated services to disclose information about the number of illegal content notices submitted by EU users, including the number of notices it received from trusted flaggers, action taken by the service provider, and the time it took to take action.
- **Content moderation.** Where regulated services take steps to moderate content on their own initiative, they must provide meaningful and comprehensible information about how this works, together with the number and type of measures taken against such content. Information on automated content moderation should also be provided.
- **User complaints.** If a complaints procedure exists, services should disclose the number of complaints received from EU users through internal handling systems in accordance with their own terms and conditions.

Services that qualify as “online platforms” under the DSA are required to comply with additional obligations to provide information about:

- **Out-of-court dispute settlements.** Where users have submitted disputes about moderation decisions to out of court dispute settlement bodies, the number of these and the median time needed for resolution should be provided. In addition, the legislation requires platforms to report on the share of disputes where they have implemented a decision rendered by a settlement body.
- **Suspensions of the service.** Online platforms must also report on the number of suspensions they have imposed against users who frequently provide illegal content.

VLOPs and VLOSEs have further reporting measures. Their report must also contain information on content moderation, including the human resources VLOPs dedicated to content moderation, the

qualifications and training of those individuals, and the accuracy of any automated content moderation conducted.

Format of Report

Services may make use of their own format to publish transparency reports on **February 16, 2025**. From July 1, 2025, onwards all intermediaries, online platforms, VLOPs, and VLOSEs will need to use a new template [published by the European Commission](#).

Wilson Sonsini Goodrich & Rosati routinely helps companies navigate complex digital regulation and privacy compliance in the UK and EU. For more information, please contact [Laura De Boel](#), [Tom Evans](#), or any member of the [data, privacy, and cybersecurity](#) practice.

Claudia Chan contributed to the preparation of this Alert.