

# Explanatory Note on content moderation

Digital Services Act



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Digital Services Act, February 2026

## Summary

In line with requirements of the Digital Services Act (DSA), we release our DSA Transparency Report, showcasing Zalando's content moderation efforts relevant for the scope of the DSA, from 1 July 2025 to 31 December 2025. This explanatory note provides context to the CSV file which we are publishing in our Transparency Hub<sup>1</sup>.

Zalando received **1,668 notices** from users, of which **477 notices** required the removal or restricting the visibility of products or pieces of content from our platform. We received **zero (no) orders from authorities**.

Over the period, Zalando had 35,852 million average monthly active recipients<sup>2</sup> (platform service) in the European Union<sup>3</sup> (88,231 million for retail service and platform service).

## About Zalando

Founded in Berlin in 2008, Zalando is Europe's leading online multi-brand fashion destination. We are building a pan-European ecosystem for fashion and lifestyle e-commerce, along two growth vectors: Business-to-Consumer (B2C) and Business-to-Business (B2B). In B2C, our two brands Zalando and ABOUT YOU, provide an inspiring, high-quality multi-brand shopping experience for fashion and lifestyle products across 29 markets. In B2B, we offer a unique e-commerce operating system with ZEOS, Tradebyte and SCAYLE, leveraging our logistics infrastructure, software, and service capabilities to support brands and retailers in managing and scaling their entire e-commerce business, across Europe<sup>4</sup>.

### Zalando operates a hybrid business model:

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<sup>1</sup> <https://corporate.zalando.com/en/investor-relations/corporate-governance/transparency-hub>

<sup>2</sup> Art. 24 (2) Digital Services Act

<sup>3</sup> Zalando launched in Portugal in August 2025 and in Greece in October 2025, through its retail activity only. There was therefore no offer by a Partner, hence no platform service, in these countries in the reporting period. Retail activities are outside of the scope of the DSA.

<sup>4</sup> For further information, please visit: [corporate.zalando.com/en](https://corporate.zalando.com/en)

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- **A Retail business**, where we sell our products to our customers. This represents 64% of our business (Gross Merchandise Value, GMV, Full Year Results 2024<sup>5</sup>). Our retail business entails no storage and dissemination of any third party content as it is Zalando's own content and products. It does not fall within the scope of the DSA.
  - **A Partner business**, where Partners sell their products to customers via Zalando. This represents 34% of our business (GMV, Full Year Results 2024). For the partner business, we make available information on products (in particular product pictures and description) which are sold by our partners.

### **Zalando's business model, operations and content moderation:**

- **Zalando partners with around 7,000 legitimate, trusted brands in the segments of clothing, footwear, accessories, beauty and lifestyle, ranging from international brands to local labels.**
- Only Partners in these segments and in the form of registered companies or professionals have the right to offer products and provide related content (i.e. product pictures and product descriptions) to our customers.
- Each partner is subject to a due diligence process and goes through an extensive onboarding process containing KYC (Know Your [Business] Customer) checks.
- Partners have to agree on a comprehensive partner contract and associated policies, annexes and guidelines, such as our "platform rules", our quality assurance manual and our content guidelines. These specify the marketability standards and legal requirements for the products offered by partners and determine mandatory requirements for each product category.
- **All content provided by Zalando's partners is checked, moderated and finally uploaded by Zalando to ensure its correctness and appropriateness.**
- Conformity with the respective contractually agreed requirements, in particular with the safety, intellectual property and sustainability requirements, is monitored by a dedicated team.
- This extensive onboarding and content moderation process encompasses all content (product pictures and descriptions) available from partners to customers before publication.

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<sup>5</sup> 2024 is the latest full year when Zalando's annual results are available. Full year results for 2025 will be published on 12 March 2026.

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- As part of our quality control processes, established long before the DSA and adapted since then, if we receive any information about inappropriate, potentially unsafe or illegal products, we investigate the case, which may include requesting further information related to product safety from the partner or sending the partner product for testing in laboratories. Depending on the nature of the content, we initiate a product recall.
  - In October 2025, Zalando launched new optional public customer profiles, which offer users in all Zalando markets a personalised space to save content (ie. existing content on Zalando), follow brands and creators, and share with other users on Zalando. Only the names of the Boards, the user profile handles and descriptions are created by users. **These profiles and boards are all moderated against Zalando's Community Guidelines before they can be shared publicly with other users.** They also include the ability for users to report such profiles and boards if they suspect them of violating local law or our Community Guidelines.
  - Zalando has established a dedicated Trust & Safety team to manage content moderation for these features. The team's responsibility is to design comprehensive policies and Community guidelines and to moderate content against those policies and guidelines, so as to ensure Zalando's standards of platform trust and safety are met. Complementing this initial moderation, all content once published may be reported by users via the Notice & Action mechanism if deemed inappropriate or harmful.
  - These two distinct layers of moderation processes ensure that only appropriate content is published. By maintaining these stringent content moderation practices, Zalando not only adheres to regulatory requirements but also upholds the integrity and safety of our platform.
  - Once we receive a notification (ie. a "notice") it will be assigned to and reviewed by members of our expert teams. If the content is found to violate local laws or our Zalando's terms of service, then the content is removed from our websites. To provide strategic oversight, Zalando has established, next to steering meetings for expert teams working on Notice & Action and Content Moderation, a Trust and Safety Steering Committee.

## Key figures (1 July 2025 - 31 December 2025)

**Notices:** Zalando received **1,668 notices**, which are reports made by users regarding content that relates to products sold by our Partners or to customers' Board and



Profiles. Upon further screening, **477 of these notices** required the removal of content or restricting the visibility of pieces of content from our platform.

**Orders from authorities:** We received **zero (no) orders from authorities**. (Since summer 2023, Zalando has never received any order from authorities related to the DSA.)

**Own Initiative Content Moderation:** Zalando took **3,272 measures** related to individual content pieces for profiles and boards, leading to visibility restrictions or removal.

**These numbers reflect Zalando's highly curated business model**, where we offer high-quality products from well-established brand partners. It also reflects Zalando's commitment to content moderation, where all social content is reviewed against our Community Guidelines before being visible to users on the platform.

Full data is available in the CSV file which we are publishing in our Transparency Hub<sup>6</sup>.

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For any media enquiry, please contact: [press@zalando.com](mailto:press@zalando.com)

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<sup>6</sup> <https://corporate.zalando.com/en/investor-relations/corporate-governance/transparency-hub>