

Explanatory Note on content moderation

Digital Services Act



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Digital Services Act, August 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 January 2026 to 30 June 2026. This explanatory note provides context to the CSV files which we are publishing in our Transparency Hub¹.

Zalando received **1,269 notices** from users. We took action on **391 notices**, requiring removal or restriction of visibility of products or pieces of content from our platform. We received **zero (no) orders from authorities**.

Over the period, Zalando had 34.27 million average monthly active recipients² (platform service) in the European Union³ (80.29 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 Europe⁴.

Zalando operates a hybrid business model:

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

² Art. 24 (2) Digital Services Act

³ Zalando launched its Partner Program in Portugal and Greece in April 2026. Until then, there was no offer by a Partner, hence no platform service, in these markets. Retail activities are outside of the scope of the DSA.

⁴ For further information, please visit: corporate.zalando.com/en

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- **A Retail business**, where we sell our products to our customers. This represents 67.9% of our business (Gross Merchandise Value, GMV, Full Year Results 2025⁵). 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 32.1% of our business (GMV, Full Year Results 2025). 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.

⁵ 2025 is the latest full year for which Zalando's annual results are available. Full year results for 2026 will be published in March 2027.

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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.
 - 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 own-initiative 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 all user content published on our platform is appropriate. 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 January 2026 - 30 June 2026)

Notices: Zalando received **1,269 notices**, which are reports made by users regarding content that relates to products sold by our Partners or to customers' Boards and Profiles. We took action on **391 notices** requiring removal of content or restriction of visibility of pieces of content from our platform.

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

Own Initiative Content Moderation: Zalando took **3,182 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 user content is reviewed against our Community Guidelines before being visible to users on the platform.

Full data is available in the CSV files which we are publishing in our Transparency Hub⁶.

For any media enquiry, please contact: press@zalando.com

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