

Digital Service Act - Transparency report

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About this report

This Report is published by Comuto SA ('Comuto') in relation to the online Daily platform ('Daily') in accordance with the transparency reporting requirements under Articles 15 and 24 of the European Union's Digital Services Act (Regulation (EU) 2022/2065) ('DSA').

Launched in 2018, Daily is part of the broader ecosystem and is a short-distance carpooling platform designed to connect drivers and passengers commuting on regular routes, primarily for home-work travel. It leverages technology to facilitate cost-sharing and reduce the environmental impact of individual commutes.

Daily has supported businesses and local authorities in creating carpooling communities tailored to each region, complementing existing public transport options. By joining forces with Klaxit, Daily has become a trusted partner for local authorities and companies in France.

Our long-held values as well as our terms and conditions for all users of our platform are designed to foster trust for all. To maintain that environment, we take action on problematic content.

As required under the Digital Services Act (DSA), this report provides insights into requests received from public authorities and users, and the content moderation activities that we engaged in to preserve the trust of our members during the reporting period.

Introduction

Comuto has developed the Daily platform, accessible in the form of a mobile application, and designed to connect drivers with passengers traveling in the same direction for regular short trips, primarily home-work commutes. The platform facilitates cost-sharing for these journeys.

Daily is an online platform where drivers and passengers provide information that Comuto stores and publishes. That being said, the information provided and edited by the users on the platform is very limited in its object and length.

On the platform, users may only provide the following content:

- Both drivers and passengers: profile pictures and private messages
- Drivers only: trip details

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Considering the limited information provided by users, the categories of notices received are constrained to the DSA category “Scope of platform” (i.e. Terms and Conditions violations).

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Section 1: Information on number of judicial or administrative orders

This section provides insight into the volume of judicial or administrative orders received during the reporting period. We note that we have not received yet any orders from Member State authorities under Article 9 DSA (orders to act against illegal content). Hence the number reported is zero.

As regards orders requesting the disclosure of information about individual recipients of the service (Article 10 DSA), we have a process in place to review the orders that we receive, and we provide responses to all of them as long as they come from legitimate judicial or administrative' authorities and are legally valid; otherwise we ask the sender to provide us with an appropriate order or we redirect to contact the competent authority. We aim to reply to every order within 24 hours (unless a specific order is complex and requires a detailed investigation). We have not received yet any orders to provide information. Hence the number reported is zero.

Section 2: Information on number of notices

Comuto has in place notice and action mechanisms in accordance with Article 16 DSA allowing users, individuals, and entities to notify Comuto of information on Daily platform that they allege to be illegal content. This mechanism is available from the Help Center in the contact form.

Given the limited amount of user-generated content on Daily platform, as well as the nature and extent of user interactions on the platform, the notices that Comuto receives relate exclusively to violations of our Terms and Conditions.

Trusted flaggers can file a notice via the contact form in line with Article 22 DSA and should self-identify themselves as such. Comuto has implemented a mechanism to appropriately prioritise these notices. During the reporting period, Comuto has not received reports by designated Trusted flaggers.

Metric	Total number (Scope of platform services)	Trusted flaggers
Number of notices received	8	0
Median time to take action on the basis of the notice	24 hours	0
Number of actions taken on the basis of the law	0	0
Number of notices considered as relevant	8	0

Section 3: Information on own-initiative content moderation

At Daily, we prioritize the delivery of safe, responsible, and compliant content to our users from the outset. We have developed a robust content review and approval framework that focuses on manual moderation of profile pictures submitted by the users.

To be more precise, profile picture can be removed if it does not meet the appropriate requirements.

We moderate content using manual review of such content on the platform. We analyze such user-generated content for violations and in case of a breach may remove the content and notify the user of such removal. In practice, the vast majority of actions are taken on profile pictures mostly to ensure they are compliant with our Terms and Conditions, so based on the category “Scope of Platform”.

Daily does not suspend accounts as a sole and direct result of its own-initiative content moderation. As a result, the only restriction applied as a result of content-moderation is removal of content.

Type of content moderated	Number of measures taken (all based on Scope of Platform)	Visibility restriction: removal
Profile picture	1 002 875	1 002 875

Section 4: Suspension imposed on repeated offenders

Per our obligations under the DSA, we maintain internal processes to address user accounts that violate our platform's Terms & Conditions.

In case of violation identified we may issue a formal communication to the user, explaining the infraction and its potential consequences. If violations continue, it can potentially lead to a final notice if necessary. For severe violations or if a user poses an immediate threat, accounts may be blocked immediately, sometimes even after an initial report, and a full investigation will follow. When an account is suspended, the user receives notification explaining the reason and outlining appeal options. Any user who appeals a suspension will undergo a case review and we will take appropriate action, either by reinstating or confirming the account suspension.

Currently, we have no repeat offenders sharing manifestly illegal content that requires sanctions. We remain vigilant and committed to maintaining a secure and compliant platform.

Metric	Total number
Number of suspensions enacted for the provision of manifestly illegal content	0
Number of suspensions enacted for the provision of manifestly unfounded notices	0
Number of suspensions enacted for the provision of manifestly unfounded complaints	0

Section 5: Out of court dispute settlement bodies and internal complaints mechanism

In the following, we refer to our internal complaints handling systems as “complaints” or “appeals”. We inform users in article 17.1 of T&Cs that they may appeal a restriction directly to Comuto in two ways: (a) by contacting us through a form available in our Help Center, and/or (b) by replying to the email informing them of a restriction. Our restriction notification emails include explanations on the grounds for the decision and information on the procedure to appeal.

Detailed information on the appeal process is provided for users in the Help Center. The provided form is easily accessible and does not require complex navigation. It is also very simple to appeal by replying to the email. There is no time limit for users to appeal. When Comuto takes a restriction decision, the reporter and author are given an opportunity to appeal.

Comuto informs the parties of the appeal receipt and responds accordingly. The appeals include both appeals from users who have submitted a notice under the notice and action mechanism, and appeals from users to who a restriction is applied. The basis for all user appeals is to challenge Comuto’s decision. We inform users that if they do not agree with relevant enforcement decisions, they may have the right to challenge the decision and that they may also be able to refer the decision to a certified dispute settlement body. For the applicable period, we did not receive any disputes from certified out-of-court settlement bodies pursuant to Article 21 DSA.

Metric	Number
Internal complaint mechanism (appeals)	
Number of complaints submitted to the internal-complaints mechanism	3
Number of restrictions upheld as a result of an internal complaint	1
Number of restrictions reversed as a result of an internal complaint	2
Median time needed to take these decisions	24 hours
Out-of-court dispute settlement bodies	
Number of decisions submitted to out-of-court dispute settlement bodies (from the list here as of on Jan 9th 2025)	0

Section 6: Statement on content moderation

Information about own initiative content moderation	
Summary of the content moderation engaged in at our own initiative	Comuto aims to keep the Daily platform trustworthy, safe and secure - so it implements manual review for the content posted by its users on the platform.
Meaningful and comprehensible information regarding the applied moderation method	Our core moderation measures are based on users' accounts profile picture manual moderation reviews. Moderators applied guidelines aligned with the Daily policy when processing a profile picture submitted by a user and could either accept or refuse the submitted picture in alignment to the Daily T&C. Approved content is accessible on our platform, while policy-violating content won't be published. Our decision can be appealed or the content can be resubmitted.
Updates to the terms and conditions	Daily may modify its terms and conditions in order to adapt to its technological and commercial environment, and to comply with the legislation in force. Any significant modification to the T&Cs will be published on the platform with mention of the date of effect, and the users are notified by Daily via email with the summary of the proposed changes before it takes effect.
Training given to human resources dedicated to content moderation	When new policies are launched or a new content moderator is onboarded, training decks and videos are provided to introduce the new content policies. Content moderators spend on average approximately 6 hours monthly receiving training, reviewing content guidelines and policy clarifications, reviewing their errors and asking questions. Frequently asked questions and knowledge database are compiled, and grey areas are clarified on a regular basis.