Digital Service Act - Transparency report

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Introduction

This Report is published by Comuto Daily ('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.

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.

Report

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

As regards judicial and administrative orders, 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.

As regards 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.

As regards our 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.

As regards suspension imposed on repeated offender, 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.

As regards out of court dispute settlement bodies and internal complaints mechanism, 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.

Links to EU Commission Transparency report template: _2025_Daily_Transparency_report