

trendyol

DSA TRANSPARENCY REPORT

31 December 2025

Table of Contents

- 1. General**
- 2. About**
- 3. Information on Average Monthly Active Recipients in the European Union**
- 4. Content Moderation in the context of the DSA**
- 5. Measures and Protection Against Misuse**
- 6. Legal Options**
- 7. Notices**

1. General

Average Monthly Active Recipients: Refers to the average number of unique users who actively engaged with the platform each month during the reporting period. This includes activities such as browsing, purchasing, posting comments, or other meaningful interactions.

Content moderators: Individuals or teams responsible for reviewing and taking action on reported content based on platform policies.

DSA: Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act).

Illegal content: Any content that violates applicable laws and/or Trendyol's terms of use. Illegal content is a broad term that can take many different forms. It may, among other things, refer to content that in itself violates the law, such as the sale of counterfeit products, fraud, hate speech, or discrimination.

Internal Complaints Handling: Our internal complaints handling process allows Users to challenge our decisions made in response to Notices. This section provides insights into the frequency of challenges and the outcomes, whether decisions were upheld or reversed.

Notices: Notices are reports submitted by customers, Trusted Flaggers, or other stakeholders alerting us to potentially illegal content on our platform. We provide an overview of the number of Notices received and our response.

Out-of-Court Settlement: Users also have the option of seeking an independent review and settling disputes through out-of-court settlement bodies. We facilitate this process to ensure fair resolution outside of legal proceedings.

Orders: Orders are requests from authorities of EU Member States to take action against illegal content. We provide information on the number of orders received and how we've addressed them.

Online Platform: It refers to both the mobile application and the Trendyol website.

Reporter: A User or Seller who flags a concern about a product, comment, or other violation of our platform policies. Reporters can be anyone who encounters potentially inappropriate content, regardless of whether they are directly affected by it. This can include individuals as well as businesses and other organizations. They help us maintain a safe and responsible online environment by bringing potential violations to our attention.

Suspensions: Temporary restrictions placed on User accounts, Seller accounts, or product listings due to policy violations.

Seller: A third party that sells products on our online platform.

Trusted Flaggers: Trusted Flaggers are individuals or organizations recognized by the Digital Service Coordinator for their expertise in detecting illegal content. The Digital Services Coordinator has not been appointed as of this report's publication.

User: Refers to any natural or legal person or entity that uses our Online Platform and is not a Seller. This also includes members and guests, unless the respective regulations explicitly differentiate between Users, guests, and members.

Very Large Online Platforms (VLOPs): Platforms designated under the Digital Services Act (DSA) based on their size and reach, exceed 45 million monthly active Users in the European Union. Due to their potential impact on society, VLOPs face stricter obligations under the DSA regarding Content Moderation, transparency, and risk management.

2. About

We were founded in 2010 with a dynamic and agile start-up spirit to make a positive impact on customers and sellers by creating a flawless e-commerce experience.

At Trendyol, we believe that technology is the driver; e-commerce is the outcome. Thanks to our dedicated team, we are one of the top five e-commerce companies in EMEA and one of the fastest-growing e-commerce companies in the world. Our commitment revolves around fostering a secure environment for all our users. This includes fostering a trustworthy environment where the Users can seamlessly purchase products and Sellers can operate with integrity.

As part of this commitment, we prioritize to be transparent about our Content Moderation practices, in accordance with the Digital Services Act (DSA). This transparency report aims to shed light on our efforts to ensure a safe online shopping experience for everyone.

3. Information on Average Monthly Active Recipients in the European Union

Average Monthly Active Recipients

In accordance with the DSA, we publish the number of Average Monthly Active Recipients on our platforms in the EU to ensure transparency and regulatory compliance.

For the period of February 2025 to August 2025

To enhance accuracy and ensure full compliance with the Digital Services Act (DSA), we revised our calculation method for determining the Average Monthly Active Recipients (AMAR).

Under this method, we calculate the AMAR by:

- 1) Counting each recipient who interacted with our platform at least once during each month of the specified period, ensuring that each individual is counted only once per month regardless of access via multiple devices or sessions.
- 2) Including both authenticated (registered) and non-authenticated (guest) users located in the EU, as well as sellers, all of whom are classified as active recipients under the DSA.
- 3) Dividing the total by six months to determine the average monthly figure, in accordance with the DSA's requirements.

In alignment with Recital 77 of the DSA, we excluded incidental users who interacted with our platform indirectly, such as through linking or indexing by a search engine provider, as they do not meet the engagement criteria for active recipients.

As of our latest assessment during the specified period, the Average Monthly Number of Active Users totals 5.400.737, remaining below the threshold for classification as a VLOP under the DSA. This approach reflects our commitment to transparency and compliance with the DSA's regulatory requirements.

4. Content Moderation in the context of the DSA

The DSA defines Content Moderation as the "measures taken by intermediary service providers to prevent, detect, and remove illegal content and address other risks of harm arising from the use of their services." These measures include a wide range of activities, from proactively identifying and removing illegal content to responding to Notices and addressing emerging risks.

In alignment with our commitment to fostering a safe and user-friendly online shopping experience, we have adopted a dual approach, combining proactive and reactive measures to address potentially harmful or illegal content.

4.1. Proactive Content Moderation

Proactive Content Moderation involves measures taken before content is published on our platform to prevent potential violations. We utilize a combination of policies, Seller rules, algorithms, and human moderation to prevent illegal content on our platform.

Seller obligations: We establish clear and comprehensive obligations for Sellers, including product safety standards, intellectual property rights, and adherence to other legal regulations.

Policies: We establish a clear and comprehensive 'Product Commenting Guideline' outlining acceptable and unacceptable behaviors on our platform. This guideline is readily accessible to all Users and informs them how to engage in respectful and constructive commentary. For more information, please refer to the 'Product Commenting Guideline' available in the Help & FAQ section.

Commenting section algorithm: We employ advanced algorithms as part of our dual approach to post-publication Content Moderation. These automated systems are designed to detect and remove illegal or policy-violating content, such as harassment, discriminatory language, hate speech, or other inappropriate material. The algorithms use predefined parameters, including keyword detection and image analysis, to identify potentially harmful content.

When the algorithm detects prohibited content with a high level of confidence, it automatically takes appropriate action, such as rejecting or removing the comment.

If the algorithm is unsure about the nature of the content, it flags it for review by human moderators. This team carefully evaluates flagged content against a comprehensive set of rules to ensure compliance with Trendyol's Terms of Use, policies, and applicable laws.

This proactive approach is further supported by reactive moderation, where inappropriate content is identified through quality controls, user feedback, or reports and manually reviewed.

Human Moderation: A dedicated team of experienced human moderators actively reviews products listed on our platform and User comments to ensure compliance with Trendyol's terms of use, other policies, and applicable laws. This proactive review process helps prevent the publication of products that might be harmful, illegal, or violate our community standards.

4.2. Reactive Content Moderation

Reactive Content Moderation refers to measures taken after content is published on our platform, in response to User reports or identified issues. We use advanced algorithms, tools, and human monitoring to detect illegal content related to products offered for sale on the online platform.

Platform review: Dedicated content moderators regularly review our platform for content published by Sellers and User comments that violate Trendyol's terms and conditions, Trendyol's terms of use, policies, and applicable laws. This involves identifying and removing illegal, harmful, or misleading content.

Automated tools for the products: Trendyol employs advanced automated tools as part of its Content Moderation efforts to ensure compliance with applicable laws and platform policies. These tools leverage image-based similarity algorithms to identify products that closely resemble known branded items. This process helps protect intellectual property rights and maintain compliance with applicable law and Trendyol policies.

Image similarity detection: One of our core algorithms identifies products based on image-based similarity. It analyzes visual elements of listed products and compares them against a database of known branded items. Products that meet or exceed a high level of similarity threshold are flagged. These flagged items are then processed automatically by our system for removal.

Trademark and logo detection: Another algorithm is designed to detect distinctive brand elements, such as trademarks, logos or unique patterns associated with the specific trademarks. This tool helps identify products that may infringe on intellectual property rights. In high-confidence cases, the system flags items and automatically remove them from the platform.

If the algorithm does not achieve a high level of confidence or similarity, the content remains on the platform. To ensure fairness and minimize errors, Trendyol manually reopens cases and reviews as part of an ongoing effort to refine moderation workflows.

Training and Support for Human Moderators: We provide trainings to ensure our human moderators can effectively and fairly manage content flagged by the Reporters. These trainings focus on understanding Trendyol's terms of use, platform policies, and applicable laws, including the principles of the DSA. Moderators are trained using practical examples and scenarios to address sensitive or complex cases that may arise during Content Moderation. Additionally, they receive regular updates to stay informed about new policies and changes to legal frameworks, ensuring consistent and fair decision-making in our Content Moderation processes.

Reporting Mechanisms: While we have measures in place to ensure a secure online environment, we also provide Users and Sellers with reporting systems that provide them the option to report any content they believe may violate Trendyol's terms of use, other Trendyol policies, or applicable laws. The Reporter agrees to express their sincere belief in good faith that the information provided is accurate and complete by submitting the report.

Product Report: If the User sees a product that violates our product policies, such as trademark infringement, misleading descriptions, safety, or other concerns, they can report it using the "Report legal concerns" button at the bottom of the 'Product Detail Page'.

This allows Users and Sellers to flag concerns they encounter regarding products on our platform, categorized into specific sections for efficient handling. These sections include but are not limited to:

Intellectual property concerns: Reports can be submitted under this section if a product is suspected of violating trademark, copyright, or design rights, or if it is counterfeit.

Inappropriate content concerns: This section is for reporting products displaying illegal symbols, offensive material that discriminates against individuals or groups, nudity, or content inappropriate for minors.

Product description concerns: Missing, inaccurate, or misleading product information can be reported under this section.

Product safety concerns: Concerns about products posing potential allergic reactions, safety risks, or lacking mandatory safety information should be reported under this category.

Other concerns: For issues not covered by the above categories, the free-text field can be used to provide a detailed description of the concern.

Comment Report: Users who encounter inappropriate comments on product pages can report them using the "Report" button. Reports can be categorized into the following sections, but are not limited to:

Spam: Repetitive, irrelevant, unsolicited content, or information unrelated to the context.

Fraud: Deceptive practices, scams, or misleading statements intended to harm or mislead others.

Hate Speech: Content that promotes discrimination, hostility, or violence based on race, ethnicity, religion, gender, or other protected characteristics.

Harassment or Bullying: Persistent or offensive behavior causing discomfort, fear, or distress to individuals.

Nudity or Sexual Content: Explicit or adult material, including sexually suggestive language or images, unsuitable for all audiences.

Child Abuse: Content that exploits or endangers children in any form.

Misinformation: False or misleading information that could harm individuals, groups, or public safety.

Promotional Content: Comments suspected of being financially influenced without proper disclosure or placed for personal gain.

Privacy Violations: Sharing personal information, such as names, addresses, or images, without explicit consent.

Violence: Content depicting, promoting, or glorifying physical or psychological harm.

Suicide or Self-Harm: Comments encouraging or promoting self-destructive behaviors or actions.

Illegal Political Symbols or Organizations: References to prohibited political symbols or organizations.

Unlawful Content: Any content that violates national or international laws, such as copyright or trademark infringement, or promotes illegal activities.

Other: For concerns not covered under the above categories, a free-text field is available for detailed descriptions.

How We Address Reports

When a report is submitted through the product or comment reporting mechanism, our content moderators review it to determine whether the reported content complies with Trendyol's terms of use, platform policies, and applicable laws, or is identified as illegal content. If the report is deemed valid—meaning the content violates our terms, policies, or legal requirements, or constitutes illegal content—immediate action is taken, such as removing the product or comment. The relevant parties are then informed of the outcome.

5. Measures and protection against misuse

Trendyol strives to offer a safe and compliant platform for all Users. To achieve this, if we determine the reported product or comment is illegal and/or violates Trendyol's terms of use, Trendyol policies, and applicable laws, we may impose restrictions on the comment or the product itself or even suspend or terminate accounts under certain circumstances.

Types of Restrictions:

Removal or limitation of content: This includes removing, or limiting the visibility of certain information deemed illegal or violating Trendyol's terms of use or policies.

Account suspension or termination: This may occur for frequent violations of our terms of use or policies, submission of unfounded complaints, or consistent sharing of illegal content.

Factors Considered in Restriction Decisions:

The absolute number of abuses: We take into account the absolute number of obviously illegal content or unfounded reports or complaints submitted within a certain time. This helps us to understand the extent of the problem and its impact on its platform.

Relative share in proportion: We also analyze the relative share of these abuses in relation to the total number of information provided or reports submitted within the same period. This ratio provides information about the prevalence of the report on the platform.

Severity of abuse: We also assess the severity of the abuse, taking into account the nature of the illegal content and its consequences. This assessment helps to evaluate the severity of the situation and the potential harm.

The intention of the parties involved: Where possible, we take into account the intention of the User or Seller.

Incorporating these factors into the decision-making process allows us to make fair, proportionate, and informed decisions when imposing restrictions on content or accounts.

6. Legal options

We understand that the Reporter may not always agree with our Content Moderation decisions. If the Reporter believes a product or comment was removed incorrectly or their account was restricted unfairly, they have the following options:

6.1. Appeal the Decision

- Reporters can submit an appeal through our Internal Complaint Handling System.
- Details and a link to the appeal system are provided in the decision update email.
- Appeals are free of charge and must be submitted electronically within six months of the decision or action.
- This process allows Reporters to request a reconsideration of the decision or action taken by Trendyol.

6.2. Out-of-Court Dispute Resolution

- If a reporter disagrees with the outcome of an appeal, they may apply for dispute resolution through a certified out-of-court dispute settlement body under Article 21 of the DSA. These bodies provide independent reviews of disputes outside formal legal proceedings. Each certified body publishes detailed rules and procedures for filing a claim.
- The European Commission maintains and updates a list of certified out-of-court dispute settlement bodies. For more information about these certified bodies, Reporters may visit the [European Commission's website](#).

Important: Please note that decisions by out-of-court dispute resolution bodies are non-binding for all parties involved, including Trendyol.

6.3. Legal Proceedings

- Applying to an out-of-court dispute settlement body does not affect the reporter's right to initiate legal proceedings in accordance with applicable laws.
- If the reporter is not satisfied with the resolution provided through internal or out-of-court channels, they may initiate legal proceedings in accordance with applicable laws in the competent courts.

For more information about the DSA, how the reporting works, Internal complaints procedure, and other legal remedies, please visit our Digital Services Act page accessible via the footer of our Platform.

7. Notices

This transparency report is being published on 31.12.2025, covering the period from 01.01.2025 to 31.12.2025. Our commitment to transparency and accountability drives us to provide regular updates on our compliance efforts and ongoing enhancements to content moderation practices.

The next report will be published by the end of December, 2026. Through these periodic reports, we aim to offer insights into our dedication to upholding regulatory standards and fostering a secure and ethical digital ecosystem for our users.

7.1 Number of Authority Orders

During the reporting period Trendyol received 0 orders from EU Member State authorities under Article 9 of the DSA to:

- Act against specific items of illegal content; or
- Provide information about specific individual recipients of the service.

7.2 Number of Notices From Trusted Flaggers

During the reporting period Trendyol received 0 notices from Trusted Flaggers under Article 22 of the DSA.

7.3 Number of Product and Comment Notices

During the reporting period, Trendyol received a total of 3.235 Notices from Reporters. Of these, 1.193 notices were not related to content governed by the DSA. These non-DSA notices primarily involved product, shipment, or account concerns, which did not involve illegal content or violations of our terms and conditions, as separately detailed in the table below.

All Notices are reviewed exclusively by human moderators to ensure accuracy and fairness, rather than relying on automated systems. Each notice is carefully evaluated against Trendyol's terms of use, policies, and applicable laws to determine the appropriate action.

7.4 Number of Notices via the Internal Complaint Handling System / Out-of-Court Dispute Settlement

During the reporting period, Trendyol did not receive any complaints or disputes through the internal complaint-handling system / out-of-court dispute settlement bodies.

7.5. Information about Trendyol's Own Initiative Content Moderation

We understand that a safe and trustworthy online shopping experience is essential for both our Users and Sellers. In this regard, we've implemented a robust Content Moderation system that combines proactive and reactive measures. This dual approach ensures a positive and secure shopping environment for everyone. By combining technology and human expertise, we create a space where trust and a responsible online shopping experience.

For more information about our comprehensive Content Moderation practices, including proactive measures and User reporting channels, please see the section "4. Content Moderation in the context of the DSA".

Report Overview

Platform Audience Overview & Times to Process Notices

Platform Audience	Total
Average Monthly Platform Service Recipients (Feb–Aug 2025)	5,400,737

EU Member States Details:	AT	BE	BG	HR	CZ	DK	EE
	293,292	216,421	3,098,244	55,495	383,797	143,214	75,683
	IT	LV	LT	LU	MT	NL	PL
	369,418	9,490	50,382	62,074	3,375	355,832	2,444,356
	FI	FR	DE	GR	HU	IE	PT
	118,690	442,220	3,016,362	5,044,975	328,979	139,253	193,209
	RO	SK	SI	ES	SE	--	--
	14,658,922	319,672	44,656	354,568	181,843		

Number of Authority Orders	Total
Number of orders by Member State	0
Breakdown by the type of alleged illegal content	n/a
Median time to inform authority of action taken	n/a
Median time needed for taking action	n/a

Number of Notices Received by Trusted Flaggers	Total
Submitted by Trusted Flaggers	0
Median time needed for informing the receipt	n/a
Median time needed for taking action	n/a

Aggregated Requests Overview

The Reason of the Product and Comment Notice	Total
Totals	3,235

*Including DSA and Customer-Initiated Requests Not Classified as Legal

Consumer information	Data protection and privacy violations	Illegal or harmful speech	Intellectual property infringements	Protection of minors	Scams and fraud	Self harm	Unsafe and prohibited products	Violence	Other
935	44	352	134	189	639	11	29	18	884

Total Number of Product Notice	1,700
Breakdown DSA Related Product Notices	507
Customer-Initiated Requests Not Classified DSA Product Related	1,193

935	0	0	134	0	0	0	29	0	602
310	0	0	134	0	0	0	29	0	34
625	0	0	0	0	0	0	0	0	568

Total Number of Comment Notice	1,535
Breakdown DSA Related Comment Notices	1,535
Customer-Initiated Requests Not Classified DSA Comment Related	0

0	44	352	0	189	639	11	0	18	282
0	44	352	0	189	639	11	0	18	282
0	0	0	0	0	0	0	0	0	0

Internal Complaint Handling for Product and Comment Notice	Total
Number of complaints received through internal complaint handling system	0
Basis for complaints	n/a
Decisions taken	0
Number of Reversals	0
Median time needed for taking action	n/a

Out-of-court settlements	Total
Number of disputes submitted	0
Decisions taken	0
Median time needed for taking action	n/a

Decisions Product Reports

Decisions for the Product Reports				Consumer information	Data protection and privacy violations	Illegal or harmful speech	Intellectual property infringements	Protection of minors	Scams and fraud	Self harm	Unsafe and prohibited products	Violence	Other
Decisions – Product Reports	No action taken	Total:	385	257	0	0	78	0	0	0	27	0	23
Decisions – Product Reports	Action taken	Total:	122	53	0	0	56	0	0	0	2	0	11
Breakdown of Action Taken													
	Action taken	Remove content	69	0	0	0	56	0	0	0	2	0	11
	Action taken	Disable access to content	0	0	0	0	0	0	0	0	0	0	0
	Action taken	Suspend monetary payments	0	0	0	0	0	0	0	0	0	0	0
	Action taken	Partially suspend provision of the service	0	0	0	0	0	0	0	0	0	0	0
	Action taken	Totally suspend provision of the service	0	0	0	0	0	0	0	0	0	0	0
	Action taken	Suspend the account	0	0	0	0	0	0	0	0	0	0	0
	Action taken	Other*	53	53	0	0	0	0	0	0	0	0	0

*Please note that the "Other" category includes actions related to missing or incorrect product information that has been identified and corrected.

Number of Action Based On The Ground	Total	Median time needed for taking action
Law	58	19 days
T&C	64	
Automated Means	0	

*Excluding Customer-Initiated Not Classified as Legal

Decisions for the Comment Reports														Consumer information	Data protection and privacy violations	Illegal or harmful speech	Intellectual property infringements	Protection of minors	Scams and fraud	Self harm	Unsafe and prohibited products	Violence	Other
Decisions – Product Reports	No action taken	Total:	1,501	0	44	344	0	189	618	11	0	18	277										
Decisions – Product Reports	Action taken	Total:	34	0	0	8	0	0	21	0	0	0	5										
Breakdown of Action Taken																							
	Action taken	Remove content	34	0	0	8	0	0	21	0	0	0	5										
	Action taken	Disable access to content	0	0	0	0	0	0	0	0	0	0	0										
	Action taken	Suspend monetary payments	0	0	0	0	0	0	0	0		0	0										
	Action taken	Partially suspend provision of the service	0	0	0	0	0	0	0	0	0	0	0										
	Action taken	Totally suspend provision of the service	0	0	0	0	0	0	0	0	0	0	0										
	Action taken	Suspend the account	0	0	0	0	0	0	0	0	0	0	0										
	Action taken	Other	0	0	0	0	0	0	0	0	0	0	0										

Number of Action Based On The Ground	Total	Median time needed for taking action
Law	0	30 days
T&C	34	
Automated Means	0	

Voluntary Content Moderation

Own initiative – T&C	Own Initiative	Product removals	
	Action taken	Remove content - human intervention	56,204
		Remove content - automated means	8,874
Own initiative – T&C	Own Initiative	Comment removals	
	Action taken	Remove content	77,854
		Disable access to content	0
	Action taken	Suspend monetary payments	0
	Action taken	Partially suspend provision of the service	0
	Action taken	Totally suspend provision of the service	0
	Action taken	Suspend the account	0
	Action taken	Other	0

Suspension for Repeated Misuse

Suspensions Imposed on Repeated Misuse	Total
Number of suspension implemented for manifestly illegal content	0
Number of suspension implemented for manifestly unfounded notices	0
Number of suspension implemented for manifestly unfounded complaints	0