



Digital Service Act - Transparency report

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About this report

This Report is published by Comuto SA ('Comuto') in relation to the BlaBlaCar online platform made available to users located in the European Union ('BlaBlaCar') 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').

Since 2006, BlaBlaCar has been at the forefront of the sharing economy, leveraging technology to develop mobility solutions for people and the environment. BlaBlaCar has been developing a global community around long-distance carpooling, with the creation of digital tools to connect people and build trust at scale. Since 2019, bus operators can offer available seats to passengers in our community. More recently, users can purchase train tickets in a limited number of countries.

Today, BlaBlaCar has a unique and major asset: a trusted community. This trust, accumulated over several years of experience and generated as members rate each other after every ride, is difficult to replicate without long-term investment.

The sense of community is strong: 88% of BlaBlaCar members report having a "high level of trust" in another BlaBlaCar member with a complete profile (compared to 42% in a neighbor or 58% in a colleague). The trust generated on the platform is therefore essential for people who never would have met otherwise to share a ride. This level of trust also creates a space for social connection: 84% of our members declare having enriching conversations in carpooling, and 76% of them say they feel useful to others thanks to exchanges in the car.¹

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.

¹ <https://newsroom.blablacar.fr/news/premier-rapport-d-impact-de-blablacar>

Introduction

Comuto has developed the BlaBlaCar platform accessible on a website and/or in the form of a mobile application, and designed (i) to put drivers traveling to a given destination in contact with passengers going in the same direction, in order to enable them to share the trip and therefore the associated costs, and (ii) to book tickets for bus or train trips operated by transport operators.

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

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

- ❖ Both drivers and passengers: profile pictures, user bios (short notes in the profile that detail driver's trip preferences, luggage space availability, meeting points, etc.), ratings from users regarding trips and rating responses, and private messages.
- ❖ Drivers only: trip details and description.
- ❖ Transport operators: trip details and information about the carrier.

Considering the limited information provided by users, the 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 any orders from Member State authorities under Article 9 DSA (orders to act against illegal content). Hence the number reported below 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 the competent authority. We aim to reply to every order within 24 hours (unless a specific order is complex and requires a detailed investigation). The table below covers the orders addressed to Comuto SA per Member State authority from where the order originated.

Metric	Total number	Member states of the European Union ²												
		FR	ES	DE	IT	BE	NL	HR	CZ	HU	PL	PT	RO	SK
Number of orders to act against illegal content	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Number of orders to provide information received and complied with ³	1516	1062	142	161	37	0	2	0	1	1	93	15	2	0
Median time to inform the authority of the receipt of the order to provide information	0 - instantly upon submitting													
Median time to give effect to the order to provide information	24 hours													

² Under the DSA, we are required to categorize orders by the type of illegal content concerned. We have not received any order to act against illegal content but only orders to provide information that we are unable to classify considering we have no information, these being related to confidential law enforcement investigations and alleged illegal activity that takes place outside BlaBlaCar platform.

³ BlaBlaCar replies to all orders to provide information as long as an official request is provided by the authority.

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 BlaBlaCar platform that they allege to be illegal and incompatible content. This mechanism is available and easily accessible either directly from the piece of content or from the Help Center through the contact form.

Given the limited amount of user-generated content on BlaBlaCar platform, as well as the nature and extent of user interactions on the platform (users mostly interact to agree on the meeting point, luggage, departure time and detours), the notices that Comuto receives only concern 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. As for the reporting period, Comuto has not received reports by designated Trusted Flaggers.

Metric	Total number (all based on the scope of platform)	Trusted flaggers
Number of notices received	223 946	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	130 468	0

Section 3: Information on own-initiative content moderation

At BlaBlaCar, 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 primarily focuses on content moderation prior to publication (cf. section 6).

We moderate content using the combination of automated and manual review prior to publication 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 private messages exchanged between carpoolers mostly to ensure there is no bypass of the platform, so based on the category “Scope of Platform”.

BlaBlaCar 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 based on Scope of Platform	with solely automated means	Visibility restriction: removal
Private messages between carpoolers	5 850 525	5 850 525	5 850 525
Public content (profile pictures, bios, ratings, etc.)	86 920	43 531	86 920

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. These processes include a system for sanctioning users who repeatedly disregard warnings.

In case of violation, we may issue a formal warning to the user, explaining the infraction and its potential consequences. If violations continue despite warnings, 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 15.1 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	2 071
Number of restrictions upheld as a result of an internal complaint	729
Number of restrictions reversed as a result of an internal complaint	1 342
Median time needed to take these decisions	68 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: Use of automated means for content moderation

Metric for public content	Total number	Internal complaints	Own-initiative	Notice and Action	
				Total	Trusted flaggers
Accuracy rate of the items processed solely by automated means	98.40%	NA	98.40%	NA	NA
Accuracy rate of the items processed partly by automated means	88.33%	NA	88.33%	NA	NA
Error rate of the automated means applied	1.60%	NA	1.60%	NA	NA

Metric for messages	Total number	Internal complaints	Own-initiative	Notice and Action	
				Total	Trusted flaggers
Accuracy rate of the items processed solely by automated means (all countries)	93.21%	NA	93.21%	NA	NA
Accuracy rate of the items processed partly by automated means	NA	NA	NA	NA	NA
Error rate of the automated means applied	6.79%	NA	6.79%	NA	NA

Section 7: Statement on content moderation

Information about content moderation	
Own initiative moderation	
Summary of the content moderation engaged in at our own initiative	Comuto aims to keep the BlaBlaCar platform trustworthy, safe and secure - so it implements automated moderation and manual review for the content posted by its users on the platform. In practice, most actions concern private messages between users to avoid Terms and conditions infringements.
Meaningful and comprehensible information regarding the applied detection method	<p>Our core moderation measures review various types of content, such as trip comments, private messages, ratings and responses to ratings, user bios and pictures.</p> <p>Most content is approved within seconds and goes live on BlaBlaCar. Content that is not approved or rejected by our automated moderation measures may be sent to a second layer of automated review or moderators for further review when potential guideline violations are detected.</p> <p>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.</p>
Updates to the terms and conditions	BlaBlaCar 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 Terms and Conditions will be published on the platform with mention of the date of effect, and the users are notified by BlaBlaCar via email with the summary of the proposed changes before it takes effect.
Training given to human resources dedicated to content	When new policies are launched or a new content moderator is

moderation	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.
Use made of automated means	
Summary of the use made of automated means for the purpose of content moderation	<p>Items are moderated using either or a mix of manual reviews, keyword detection-based decisions, and ML-based decisions.</p> <p>Manual decisions are used both for complex or critical cases, and for performance measurement purposes.</p>
Qualitative description of the automated means	Our automated means involve complex lists of keywords and/or open-source generic models to identify content requiring moderation and/or manual review.
Specification of the precise purposes to apply automated means	Our automated means are designed to detect both illegal content and incompatible content that violate our content policies. Problematic content identified may be sent to our content moderators for manual review. Content moderators will make the final decision.
Safeguards applied to the use of automated means	We perform continuous random sampling of all items that have been moderated by automated tools, which are reviewed by agents in order to measure the performance of moderation tools, and ensure that the quality of the automated decisions taken is within the acceptable range.