worksmile

DIGITAL SERVICES ACT (DSA) · ARTICLE 15

Transparency Report

for the periods 17.02.2024–31.12.2024 and 01.01.2025–31.12.2025

Provider: Worksmile sp. z o.o.
Legal basis: Article 15(1) of Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services
Publication date: 19.10.2026

1. Provider information

Worksmile sp. z o.o. provides a hosting service within the meaning of Article 3(g)(iii) DSA. The Worksmile App is purchased by employers as a tool for internal communication and HR processes for their teams. Each employer uses a separate, closed instance of the App, and content published by users is accessible only to people within the given organisation. The Company is not an online platform within the meaning of Article 3(i) DSA.

Field	Information
Provider	Worksmile sp. z o.o. (formerly FITQBE sp. z o.o.), ul. Szwedzka 24, 03-420 Warsaw, Poland
KRS (court register no.) / NIP (tax ID)	0000605281 / 5272761750
Service covered by the report	Worksmile App: storage of content published by users (posts, comments, photos, activities, kudos, groups)
DSA classification	Provider of intermediary services – hosting service; not an online platform
Point of contact for authorities (Article 11)	dsa@worksmile.com; languages: Polish, English
Point of contact for recipients of the service (Article 12)	dsa.customer@worksmile.com and the “Report” option in the App
Moderation rules (Article 14)	Worksmile App Terms of Service, Chapter X (in force since 03.05.2025); previously an internal notice-handling procedure (since 06.2024)

2. Reporting periods and methodology

The report covers two reporting periods: from 17.02.2024 (the date from which the DSA applies to the Company) to 31.12.2024, and from 01.01.2025 to 31.12.2025. Data are presented separately for each period.

- Data sources: automated notifications from the “Report” option in the App (available since 20.06.2024 on the web and since 25.06.2024 in the iOS and Android apps), the dsa@worksmile.com mailbox, and the ticketing system to which the mailbox has been redirected since August 2025.
- Unit of measurement: a notice is a unique “notifier – reported content” pair. Multiple notifications by the same person about the same content are counted as one notice.
- Exclusions: 15 test notices submitted by the Company’s employees, 28 repeated notifications and 2 notifications that did not concern content covered by the DSA.
- Handling time: from receipt of the notice to the first substantive response sent to the notifier, reported as a median in hours; the median covers notices with a documented response.

- Categories: assigned according to the content of the notice, not according to an assessment of whether it was well founded, following the categories in Annex I to Commission Implementing Regulation (EU) 2024/2835.
- Where no events were recorded for an item, 0 is entered; “n/a” means that the indicator is not applicable.

3. Orders from Member State authorities (Articles 9 and 10 DSA)

During the reporting periods the Company received no orders to act against illegal content and no orders to provide information.

Type of order	2024	2025	Member State	Acknowledgement, median (h)	Giving effect, median (h)
Order to act against illegal content (Article 9)	0	0	—	n/a	n/a
Order to provide information (Article 10)	0	0	—	n/a	n/a

4. Notices (Article 16 DSA)

On receipt of a notice, the Company acknowledges it, assesses the reported content and informs the administrator designated by the employer, who manages the App instance of their organisation and has tools to remove and edit content and to deactivate accounts. The Company responds to the notifier and, where necessary, may remove or block illegal content itself.

The Company received 19 notices in 2024 and 30 notices in 2025. No notice was submitted by a trusted flagger, and none was processed by automated means. More than 60% of notices (31 of 49) did not concern illegal content; users also use the DSA notice channel to contact the App provider about other matters.

Period 17.02.2024–31.12.2024

Category	Notices	Company action – law	Company action – Terms	Removed (client admin / author)	No change
Illegal or harmful speech (incl. hate speech, insult)	3	0	0	0	3
Cyber violence, harassment, intimidation	0	0	0	0	0
Data protection and privacy violations	0	0	0	0	0
Intellectual property infringements	0	0	0	0	0
Pornographic or sexualised content	0	0	0	0	0
Violence	1	0	0	1	0
Scams and fraud	0	0	0	0	0
Content outside the scope of the service	0	0	0	0	0
Other matters (unrelated to illegal content)	15	0	0	0	15
Total	**19**	**0**	**0**	**1**	**18**

Period 01.01.2025–31.12.2025

Category	Notices	Company action – law	Company action – Terms	Removed (client admin / author)	No change
Illegal or harmful speech (incl. hate speech, insult)	6	0	0	5	1
Cyber violence, harassment, intimidation	3	0	0	2	1
Data protection and privacy violations	0	0	0	0	0
Intellectual property infringements	0	0	0	0	0
Pornographic or sexualised content	0	0	0	0	0
Violence	0	0	0	0	0
Scams and fraud	0	0	0	0	0
Content outside the scope of the service	5	0	0	2	3
Other matters (unrelated to illegal content)	16	0	0	1	15
Total	**30**	**0**	**0**	**10**	**20**

Handling time and method

Indicator	2024	2025
Total notices	19	30
Notices with a documented response to the notifier	15	29
Median time to response (h)	45.4	13.3
Longest time to response (h); deadline under the Terms: 336 h	133.4	139.8
Notices from trusted flaggers	0	0
Notices processed by automated means	0	0
Content removed or modified by the client administrator or the author (number of items)	1	7
Accounts deactivated by the client administrator	0	1

The Company did not need to apply its own restrictions in response to notices: in 1 notice from 2024 and 10 notices from 2025 (8 items of content in total), the reported content was removed or modified by the client administrator or by the author. 4 notices from 2024 and 1 notice from 2025 did not receive a documented response; since August 2025 all notices and responses have been recorded in the ticketing system.

5. Content moderation on the provider’s own initiative

The Company does not systematically review content. In 2025, at the request of a client administrator sent to technical support, the Company removed 2 items of content (kudos with a comment) on the basis of the Terms. The authors of that content did not receive a statement of reasons at the time; since **August 2025**, whenever content is removed, the Company provides the author with a statement of reasons together with information on the possibility of appeal (Article 17 DSA).

Restriction	2024	2025
Removal of content	0	2
Restriction of visibility or modification of content	0	0
Temporary account suspension	0	0

Restriction	2024	2025
Account termination	0	0
Notifications to law enforcement (Article 18)	0	0

Resources and training

Notices are handled by the Company's technical support team: 4 people in 2024 and 5 people in 2025, working on a rotating duty basis, in Polish and English. The team follows a written notice-handling procedure with response templates (since June 2024); new team members are onboarded through knowledge transfer within the team.

6. Complaints and appeals

Item	2024	2025
Number of appeals	0	0
Decision upheld	0	0
Decision reversed	0	0
Median handling time (h)	n/a	n/a

Appeals against decisions are handled within 14 days (Terms, Chapter X, para. 9). No appeals were received during the reporting periods.

7. Use of automated tools

The Company does not use automated tools or artificial intelligence systems to detect, assess, hide or remove user content; all decisions are taken by a human (Terms, Chapter X, para. 7). Accordingly, no accuracy indicators or error rates are reported.