



The LEGO Group

# Digital Services Act Transparency Report

## LEGO® Ideas & LEGO® Ambassador Network

# 2025



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Welcome to the Digital Services Act Transparency Report 2025!  
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**Name of provider:** LEGO System A/S

**Name of application:**  
LEGO® Ideas & LEGO Ambassador Network

**Reporting period:** 17/02/2025 - 31/12/2025

**Date of submission:** February 2026

# Introduction

## **Safeguarding the LEGO Group's Adult communities online**

For over 90 years, the LEGO Group has been dedicated to fostering a positive impact within our fan communities. Our core brand values—caring and quality—guide our efforts to create meaningful and memorable experiences for our adult community, regardless of the platform through which they engage with the LEGO® brand, whether online or at our physical touchpoints.

In alignment with the European Commission's commitment to addressing harmful and illegal content online, all content associated with our adult experiences is required to comply with the LEGO Group's Code of Conduct, community guidelines, and relevant policies. This requirement extends to all users, LEGO Account holders, and any individuals who contribute to our platforms or websites. It is important to note that violations of the Code of Conduct on one platform, website, or application may lead to repercussions across other platforms, sites, or applications. The Code of Conduct is a dynamic document, subject to ongoing review to ensure it effectively addresses emerging issues and situations.

In our commitment to maintaining vibrant and healthy communities, the LEGO Group has established a systematic approach for responding to content reports from users of our online experiences. We actively encourage our users to report any content that they believe violates our Code of Conduct or community guidelines, or any material that they suspect may break the law. Each report is meticulously reviewed by our dedicated moderation team, who assess the situation in accordance with established policies and protocols. This process not only ensures that appropriate actions are taken when necessary but also fosters a sense of trust and safety within our community.

We prioritise community engagement as a vital component of our strategy to cultivate thriving online communities. Through regular engagement and community outreach, we seek to understand the needs and concerns of our users, allowing us to adapt and enhance our guidelines and practices accordingly. Our proactive measures include continuous monitoring of the platforms to identify and address any content that may not align with our standards. By combining responsive actions

with proactive engagement and community involvement, we strive to create a positive and inclusive atmosphere where all fans can share their passion for LEGO products.

Both the LEGO Ideas report and the LEGO Ambassador Network report cover the period from February 17, 2025, through December 31, 2025, inclusive.

# LEGO Ideas

- Report Identification
- Member State Orders
- Notices
- Own Initiative Illegal
- Own Initiative Terms & Conditions
- Appeals and Recidivism
- Automated Means
- Qualitative

## Report identification

17 February – 31 December

Indicator	Value
Name of the service provider	LEGO System A/S
Date of the publication of the report	2026-02
Date of the publication of the latest previous report	11/04/2025
Starting date of reporting period	17/02/2025
Ending date of reporting period	31/12/2025

## Member State Orders

17 February – 31 December

### Number of orders to act against illegal content received

No orders from member state authorities to act against illegal content were received during the reporting period.

### Number of orders to provide information

No orders from member state authorities to provide information were received during the reporting period.

## Notices

17 February – 31 December

Category of illegal content	Number of notices received	Number of specific items of information included in the total number of notices	Median time to take action	Number of actions taken on the basis of the terms and conditions of the service
<b>Total</b>	<b>1124</b>	<b>3307</b>	<b>Average 155500 seconds</b>	<b>734</b>
<b>Consumer Information</b>				
Hidden advertisement	263	198	1 day	
<b>Cyber violence</b>				
Cyber bullying intimidation	22	30	1 day	
Cyber Harassment	41	29	1 day	
Other	104	508	1 day	
<b>Data protection and privacy violations</b>				
Right to be forgotten	117	567	1 day	
Other	1	1	2 days	
<b>Illegal or harmful speech</b>				
Discrimination	5	1	1 day	
<b>Intellectual property infringements</b>				
Copyright infringement	29	456	8 days	
Other	28	476	4 days	



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## Notices

(continued)

Category of illegal content	Number of notices received	Number of specific items of information included in the total number of notices	Median time to take action
<b>Scams and Fraud</b>			
Inauthentic accounts	31	2	1 day
Phishing	1	1	1 day
Other	3	0	0
<b>Self harm</b>			
Other	3	3	1 day
<b>Not specified notice</b>			
Breach of Terms of Service	476	1035	2 days

## Contextual information

Notices

### Number of actions taken on the basis of the law

Within the assessment period, no actions were taken in response to a user report on the basis of law exclusively.

### Number of actions taken on the basis of the terms and conditions of the service

The vast majority of reports received regarding alleged breaches of LEGO Ideas' terms and conditions were evaluated as unfounded following manual review by a human moderator. For all upheld reports, the content was removed from the experience and was no longer accessible/visible to users of the application. Following removal, the posting user was advised that their content was taken down, the grounds relied upon for the action, and advised of the availability of an appeal process.

## Own Initiative Illegal

17 February – 31 December

Category of illegal content	Number of measures taken at the provider's own initiative	Number of measures taken after detection with solely automated means
Total	0	0

## Contextual information

Own Initiative Illegal

### Number of measures taken at the provider's own initiative

No measures were taken within the assessment period that were based entirely upon the illegality of the content

## Own Initiative Terms & Conditions

17 February – 31 December

Category of incompatibility with the provider's terms and conditions	Number of measures taken at the provider's own initiative	Number of measures taken after detection with solely automated means	Visibility restriction Removal	Account restriction Suspension	Account restriction Termination
<b>Total</b>	<b>14196</b>	<b>0</b>	<b>13879</b>	<b>36</b>	<b>281</b>
<b>Animal welfare</b>					
Other	2	0	1	1	0
<b>Consumer information</b>					
Hidden advertisement	3446	0	3401	7	38
<b>Cyber violence</b>					
Cyber bullying intimidation	23	0	22	1	0
Cyber Harassment	35	0	29	3	3
Non-Intimidation Bullying	479	0	476	3	0
<b>Data protection and privacy violations</b>					
Right to be forgotten	3691	0	3687	4	0
Other	77	0	73	4	0
<b>Illegal or harmful speech</b>					
Discrimination	6	0	4	1	1
<b>Intellectual property infringements</b>					
Copyright infringement	480	0	479	1	0
Design infringement	32	0	32	0	0
Other	823	0	821	2	0
<b>Protection of minors</b>					
Age specific restrictions minors	2	0	1	0	1



## Own Initiative Terms & Conditions

(continued)

Category of incompatibility with the provider's terms and conditions	Number of measures taken at the provider's own initiative	Number of measures taken after detection with solely automated means	Visibility restriction Removal	Account restriction Suspension	Account restriction Termination
<b>Scams and fraud</b>					
Inauthentic accounts	341	0	321	0	20
Other	2	0	1	0	1
<b>Self harm</b>					
Other	1	0	1	0	0
<b>Other violations TC</b>					
Adult sexual material	1	0	1	0	0
Age specific restrictions	732	0	521	0	211
Language requirements	2	0	2	0	0
Breach of Terms & Conditions and Conduct Requirements	4021	0	4006	9	6

### Contextual information

Own Initiative Terms & Conditions

#### Number of measures taken at the provider's own initiative

Refers to all content and conduct that was found to be in violation of the LEGO Group's community guidelines and terms of service for the LEGO Ideas platform and was subsequently removed.

#### Number of measures taken after detection with solely automated means

No actions are taken based solely upon automated decision making.

#### Visibility restriction Removal

Content that is found to be in violation of the LEGO Group's policies is wholly removed and is no longer accessible from within the LEGO Ideas platform.

#### Account restriction Suspension

User accounts are temporarily suspended in the event of moderately severe or repeated violations of the LEGO Group's community guidelines and/or Terms of Service.

#### Account restriction Termination

User accounts are permanently disabled in the event of extremely harmful conduct or if the user continues to violate the LEGO Group's policies following a temporary suspension.

## Appeals and Recidivism

17 February – 31 December

Section	Indicator	Scope	Value
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Total number	73
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Decisions upheld	51
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Decisions partially reversed	0
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Decisions reversed	22
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Median time	12 hours
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Decision omitted	52
Internal complaints mechanism	Complaint regarding a decision to suspend or terminate the provision of the service"	Total number	1
Internal complaints mechanism	Complaint regarding a decision to suspend or terminate the provision of the service"	Decisions upheld	1
Internal complaints mechanism	Complaint regarding a decision to suspend or terminate the provision of the service"	Median time	7 days

### Contextual information

Appeals and Recidivism

#### Number of complaints submitted to the internal-complaints mechanism

Includes decisions where complainants have not provided requested follow-up information that was required as part of complaint investigations

No partial reversals of original decisions were recorded in the assessment period.

Includes all cases where an original moderation decision was wholly reversed due to the submitted complaint.

Average calculated based on time between the receipt of complaint to case closure.

## Automated Means

17 February – 31 December

Section	Indicator	Scope	Value	
Use of automated means for content moderation	Number of measures solely taken by automated means	Total number	N/A	No automation for reporting/moderation

## Qualitative

17 February – 31 December

Indicator	Value
Summary of the content moderation engaged in at the providers' own initiative	Moderation is performed within LEGO Ideas to ensure only appropriate content is available through the site, as well as to ensure the quality of community interaction following LEGO Ideas' Rules of Conduct, Terms and Conditions, and other guidelines.
Meaningful and comprehensible information regarding content moderation engaged in at the providers' own initiative	All content posted to LEGO Ideas must adhere to the LEGO Group's Code of Conduct, community guidelines, and policies. This applies to users, LEGO Account holders, and anyone else who posts on our platforms or sites. Violations of the Code of Conduct on one platform, website, or app may result in consequences on other platforms, sites, or apps. Moderation is performed ongoingly across the LEGO Ideas platform to ensure these behaviour standards are met and users are able to lodge reports (or notices) to alert the LEGO Group to content or conduct that they believe requires further assessment or review.
Qualitative description of the automated means	No moderation actions are performed on the LEGO Ideas platform through solely automated means.

# LEGO Ambassador Network

- Report Identification
- Notices

## Report identification

17 February – 31 December

Indicator	Value
Name of the service provider	LEGO System A/S
Date of the publication of the report	2026-02
Date of the publication of the latest previous report	11/04/2025
Starting date of reporting period	17/02/2025
Ending date of reporting period	31/12/2025

## Notices

17 February – 31 December

Category of illegal content	Number of notices received	Number of notices received from Trusted flaggers	Number of specific items of information included in the total number of notices	Number of specific items of information included in the total number of notices by Trusted Flaggers (Trusted Flagger notices)	Median time to take action	Number of actions taken on the basis of the law	Number of actions taken on the basis of the terms and conditions of the service
<b>Total</b>	<b>6</b>	<b>0</b>	<b>6</b>	<b>0</b>	<b>172800 seconds</b>	<b>0</b>	<b>2</b>
<b>Illegal or harmful speech</b>							
Reference to historical discrimination	1		1				
<b>Intellectual property infringements</b>							
Unannounced product leak	1		1				
<b>Not specified notice</b>	<b>4</b>		<b>4</b>				

### Contextual information

Notices

#### Number of notices received

This number reflects the total number of reports submitted within the LEGO Ambassador Network experience by users during the reporting period.

#### Number of notices received from Trusted flaggers

No notices from Trusted Flaggers were received during the reporting period.

#### Number of specific items of information included in the total number of notices

Each report received corresponded with an individual piece of content.

#### Median time to take action

Calculated as an average, all content reports were processed (reviewed, investigated and actioned) within 2 days following their receipt.

#### Number of actions taken on the basis of the law

Within the assessment period, no actions were taken in response to a user report on the basis of law exclusively.

#### Number of actions taken on the basis of the terms and conditions of the service

The majority of reports received regarding alleged breaches of LEGO Ambassador Network terms and conditions were evaluated as unfounded following manual review by a human moderator. For all upheld reports, the content was removed from the experience and was no longer accessible/visible to users of the application.

**LEGO System A/S**

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