



The LEGO Group

Digital Services Act Transparency Report

LEGO® Play

2025



Table of Contents

Introduction	03
Report Identification	04
Member State Orders	04
Notices	05
Own Initiative Illegal	06
Own Initiative Terms & Conditions	07
Terms of Service Community Guidelines	09
Appeals and Recidivism	10
Automated Means.....	11
Qualitative	12

Welcome to the Digital Services Act Transparency Report 2025!
If you get lost, you can press the yellow brick in the left corner to return here!



Name of provider: LEGO System A/S

Name of application: LEGO Play

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

Date of submission: February 2026

Introduction

Safeguarding the LEGO Group's Kids Communities online

At the LEGO Group, our mission centres around children, and we are wholeheartedly committed to creating digital experiences that empower them to play and express their creativity in the digital realm. We firmly believe that play is fundamental to children's learning and development. Our ambition is to reach as many children as possible with LEGO® play opportunities while taking active responsibility to ensure that our products are designed with children's rights and safety as our foremost priorities.

Throughout our history, we have earned the trust of parents and children by providing safe, high-quality products that not only meet but exceed the most rigorous international toy safety regulations and standards. This enduring commitment to safety and well-being extends seamlessly into our digital products, ensuring that children can engage with our offerings in a safe digital environment. We recognise that safety is not a static goal but an ongoing commitment that requires continuous improvement and adaptability to emerging challenges.

The LEGO Group aligns with the European Commission's commitment to addressing harmful and illegal content online. As a company that reaches millions of children through both physical and digital play, we recognize our responsibility to safeguard and empower children in our online environments. To achieve

this, we actively encourage feedback from our community, allowing us to adapt our practices and guidelines based on the needs and concerns of users. This collaborative approach fosters a positive online community where children can interact safely and respectfully.

The LEGO Play App Transparency Report covers a ten-month data period from February 17 through December 31, 2025.

The LEGO Group's Content Moderation Approach

All user-generated content (UGC) published within LEGO Play is required to adhere to our Code of Conduct and Terms of Service. This Code of Conduct applies to all visitors of any LEGO Group platforms, websites, or apps, including users, LEGO Account holders, and any individuals who post on these platforms. Violations of the Code of Conduct on one platform may result in consequences across other platforms, reflecting our unified commitment to safety and respect. Our Code of Conduct is a living document, subject to ongoing review to ensure it effectively addresses emerging issues and situations.

We develop our children's experiences with intentionality, prioritising their safety and protection while engaging with the LEGO Play community. A key safeguard in our children's community is the implementation of pre-moderation, which ensures that all

content submitted to our platforms is reviewed and approved before publication. We enforce these policies through a combination of human review and technology-enabled moderation, ensuring that only content that meets our safety standards is shared. This enforces the LEGO Group's ambition to maintain healthy and positive experiences for all within the platform.

In our commitment to maintaining vibrant and healthy online communities, the LEGO Group has established a systematic approach to responding to user reports. We actively encourage users to report any content that they believe violates our community guidelines or is suspected of being in breach of the laws of any of the countries in which we operate. Each report is reviewed by our moderation team, who assess the situation in accordance with established pre-moderation protocols. This systematic approach to safety not only ensures that appropriate actions are taken when necessary but also fosters a sense of fairness, consistency and transparency for our communities.

Following a notice of content moderation, impacted users and reporters have the right to appeal enforcement decisions. Appeals allow users affected by content moderation actions to communicate that they believe an enforcement decision was made in error. Appeals must be submitted within the app, and decisions are taken by qualified staff exclusively. Automated decision making is not utilised as part of this

process. This commitment to transparency and accountability ensures that our community feels heard and respected.

We also prioritise community engagement as a vital component of our strategy to secure thriving online communities for children. Through regular engagement and community management, 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 the responsive actions of our pre-moderation capabilities with proactive measures like community management, the LEGO Group demonstrates its unwavering commitment to creating a safe and engaging digital environment for children.

Report identification

1 January – 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

Category of illegal content	Scope	Number of orders to act against illegal content received	Number of specific items of information included in the total number of orders to act against illegal content	Number of orders to provide information
Total	Total	0	0	0

Contextual information

Member State Orders

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 law	Number of actions taken on the basis of the terms and conditions of the service
Total	1726	1726	4000 seconds	42	45
Cyber violence					
Bullying intimidation	446	446	4000 seconds		
Scams and fraud					
Account hijacking	106	106	4000 seconds		
Self harm					
Suicide	61	61	4000 seconds		
Violence					
Hatred	106	106	4000 seconds		
Not specified notice	601	601	4000 seconds		
Breach of Terms of Service	406	406	4000 seconds		

Contextual information

Notices

Number of notices received

This number reflects the total number of reports submitted within the LEGO Play 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 one hour following their receipt.

Number of actions taken on the basis of the law

All actions taken on the basis of law were in

response to minimising the likelihood of real-world harm. All credible incidents resulted in the content being removed from LEGO Play and, where relevant, were escalated to law enforcement without undue delay.

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 Play's 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. No content removal actions taken in response to a report were reversed on appeal during the assessment period.

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	Visibility restriction Other	Provision of the service Suspension	Provision of the service Termination
Total	140	0	140	126	14
Protection of minors					
Child sexual abuse material	14	0	14	0	14
Grooming sexual enticement minors	126	0	126	126	0

Contextual information

Own Initiative Illegal

Number of measures taken at the provider's own initiative

The LEGO Group evaluates all incoming user-generated content for the presence of illegal content, conduct and attempted contact between users. If illegal materials are detected or suspected, immediate actions are taken to reject the content from going live within our experiences and to ensure escalation to law enforcement occurs without delay.

Number of measures taken after detection with solely automated means

No actions are taken against illegal content based solely upon automated decision making. While content may be initially flagged by automated means of detection, the content

must be validated by a human moderator to assess severity and to initiate relevant escalation procedures.

Visibility restriction Removal

Content is 'rejected' rather than 'removed' in pre-moderation.

Visibility restriction Other

All user-generated content that is uploaded to the LEGO Play app is pre-moderated, meaning content is assessed for illegal material or conduct, and if detected is rejected before going live. Content that is suspected of being illegal is stored securely by the LEGO Group in accordance with legal requirements.

Provision of the service Suspension

We suspected there were 126 instances of grooming sexual enticement of minors. These 126 received a service suspension and visibility restriction. However, upon further review by a human moderator, none were identified as reaching a threshold of suspected illegality that required additional action, such as a NCMEC referral.

Provision of the service Termination

The LEGO Group has a zero tolerance policy regarding content that is suspected to depict or reference Child Sexual Abuse Material (CSAM). Access to LEGO Play is immediately and permanently terminated if a user is found to have attempted to have submitted content of this type to the platform.

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 Other
Total	73342	14782	73342
Animal welfare			
Animal harm	19	2	19
Consumer information			
Hidden advertisement	2	0	2
Misleading info consumer rights	15	0	15
Cyber violence			
Cyber bullying intimidation	138	34	138
Cyber harrassment	261	76	261
Cyber stalking	64	21	64
Non-intimidating bullying	2174	375	2174
Illegal or harmful speech			
Hate speech	749	109	749
Intellectual property infringements			
Copyright infringements	172	26	172
Negative effect on civic discourse or elections			
Misinformation disinformation	169	128	169
Protection of minors			
Specific restriction minors	24489	5434	24489
Unsafe challenges	11	3	11
Content of interest to predators	27	0	27



Whenever you see the small arrow, just follow the note to the next page.

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 Other
Risk for public security			
Illegal organizations	397	138	397
Risk public health	18	0	18
Scams and fraud			
Impersonation account hijacking	69	43	69
Inauthentic listings	2	0	2
Inauthentic user reviews	4	0	4
Phishing	12	8	12
Self harm			
Content promoting eating disorders	5	0	5
Self mutilation	29	3	29
Suicide	39	3	39
Unsafe or prohibited products			
Prohibited products	211	97	211
Unsafe products	10	1	10
Violence			
Human trafficking	4	2	4
Other violation			
Adult sexual material	275	17	275
Goods services not permitted	159	110	159
Language requirements	2221	0	2221
Failure to meet content quality standards	374	0	374
Breach of Terms & Conditions and Conduct Requirements	41223*	8152	41223

* See page 9 for breakdown

Contextual information

Own Initiative Terms & Conditions

Number of measures taken at the provider's own initiative

The LEGO Group maintains rigorous online safety and wellbeing standards that are enforced through our moderation capabilities. While the detection of illegal and potentially harmful content is a key priority, substantial emphasis is also placed on ensuring LEGO Play is a positive, inclusive and accessible experience for all users. As a result, our pre-moderation content reviews reject all content that does not meet our community and quality standards.

Number of measures taken after detection with solely automated means

Content is automatically rejected within LEGO Play if obvious breaches of the LEGO Group's Terms of Service are detected. This includes but is not limited to poor image or video quality, the disclosure of personal information, images of real faces and swearing and other offensive language which are not permitted on the platform.

Visibility restriction Other

All user-generated content that is uploaded to the LEGO Play app is pre-moderated, meaning problematic content is vetted against our Terms of Service and rejected before going live if it is found to be in breach of conduct requirements. The LEGO Group sets a high safety standard in relation to its moderation policies, electing to remove content that does not meet the legal definition of harmful content, but still has the capacity to negatively impact child audiences.

The LEGO Group's Terms of Service Categories Community Guidelines

Category	Number
Antisocial behaviour	124
Brand abuse	204
Bullying report(self)	567
Campaigning	2104
Chat ownership or claims	449
Copied creation	26
Drugs and alcohol references	692
Fictional violence and personal safety	4764
General risk	2758
Junk	3660
Negative content	5525
Off topic	6001
Person visible	3738
Profanity and vulgarity	4506
Promotion	70
Real life conflict mention	193
Risk to personal safety	321
Spam	318
Ultimatums	239
Untranslatable	1059
User currently silenced	134
Vulnerable user	1264
Weapon names and imagery	3490

The LEGO Group has adopted firm Community Guidelines and Terms of Service requirements that define acceptable content sharing and conduct standards for LEGO Play users. Our focus is ensuring that children are afforded a safe and age-appropriate online creative experience within LEGO Play, with all user-generated content (UGC) being pre-moderated ahead of publication to ensure it conforms with our policies.

While all children are encouraged to be creative, imaginative and engaged within LEGO Play, the content they share must positively contribute to our community. In addition to illegal and harmful content types, any materials that reference, picture, describe or allude to topics that are inappropriate for child audiences are rejected in pre-moderation. This can include frightening topics, profanity and other adult language, references to age-restricted activities or products and risky conduct for young children.

In addition to restricting age-inappropriate content, the LEGO Group also rejects any content that is considered spam or junk to ensure the quality of the content available within LEGO Play.

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	1
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Decisions upheld	1
Internal complaints mechanism	Number of complaints submitted to the internal-complaints mechanism	Median time	7 days*
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

* One formal complaint concerning a suspension of user access to LEGO Play was received during the reporting period.

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	14782
Use of automated means for content moderation	Number of measures not taken by automated means	Total number	58700
Use of automated means for content moderation	Accuracy of the automated means - Accuracy	Total number	99,92%
Use of automated means for content moderation	Accuracy of the automated means - Precision	Total number	92,93%
Use of automated means for content moderation	Accuracy of the automated means - Recall	Total number	78,67%
Use of automated means for content moderation	Number of measures solely taken by automated means	Own-initiative	14782
Use of automated means for content moderation	Number of measures not taken by automated means	Own-initiative	58700
Use of automated means for content moderation	Accuracy of the automated means - Accuracy	Own-initiative	99,92%
Use of automated means for content moderation	Accuracy of the automated means - Precision	Own-initiative	92,93%
Use of automated means for content moderation	Accuracy of the automated means - Recall	Own-initiative	78,67%
Use of automated means for content moderation	Number of notices solely processed by automated means	NAM Total	0
Use of automated means for content moderation	Number of notices not processed by automated means	NAM Total	1726
Use of automated means for content moderation	Number of notices solely processed by automated means	NAM Trusted Flagger	N/A

Contextual information

Automated Means

Number of notices solely processed by automated means

All notices are processed via human moderators.
No automation is utilised in this process.

No Trusted Flagger reports received during reporting period.

Qualitative

17 February – 31 December

Indicator	Value
Summary of the content moderation engaged in at the providers' own initiative	Moderation is performed to assess content for its suitability to be published within the LEGO Play app. Our hybrid moderation solution that utilises both automation and human reviews has been adopted to increase accuracy and speed of first pass detection. Continuous improvement of both human and automated moderation performance is supported through an internal quality review and optimisation process.
Meaningful and comprehensible information regarding content moderation engaged in at the providers' own initiative	All content submitted to LEGO Play must adhere to the LEGO Group's Code of Conduct, community guidelines, and policies in order to be successfully published to the experience's content feed. This applies to all users of the platform equally to ensure a fairness of application for our audience. LEGO Play features a two-layer approach to moderation protection; pre-moderation is utilised to remove problematic, harmful, or illegal material before it can be viewable to other users within the experience, while reporting is available and encouraged to allow users to flag content or conduct that they want reviewed further. Moderation is performed ongoingly within LEGO Play to ensure coverage and responsiveness at all times.
Qualitative description of the automated means	We are using automated means for moderation in situations where we can quickly identify content that fails to meet our minimum quality standards or uploads that include clear usage of unacceptable words, profanity or phrases. Automated means are not used when evaluating reports received from users nor in the provision of actions in response to content/conduct violations, such as account suspensions or permanent bans which are the responsibility of human moderators.
Qualitative description of indicators of accuracy and possible rate of error of automated means	The accuracy of the automated moderation is assessed through the rates of false negatives and false positives against correct decisions. Quality reviews are human-led to assess accuracy rates and to prioritise areas of development and refinement. The measured rate of performance error across the automated solutions remained below 1% across the reporting period.
Specification of the precise purposes to apply automated means	Automation is used to increase the detection speed of illegal, harmful and inappropriate content as part of pre-moderation activities. It allows the LEGO Group to reject submissions and give users quick feedback in the event of content rejection, while also increasing the speed that escalations can be performed in the event of incidents of high harm potential.
Safeguards applied to the use of automated means	Automated moderation functionalities are ongoingly monitored and quality assessed regularly through human review to ensure that performance meets acceptable standards. In the event of lapses in accuracy or precision, training is deployed to optimize and correct shortcomings within the models.

LEGO System A/S

Aastvej 1 | DK-7190 Billund
+45 7950 6070 | www.LEGO.com

CVR no 47 45 87 14

Incorporated 30 June 1973

Residence Billund, Denmark

Financial Year 1 January – 31 December

Date of publication February 2026

Design eTypes

2025 Digital Services Act Transparency Report
is published for the LEGO Group by Finance and
Corporate Brand

Contact information

Questions regarding our Digital Services Act
Transparency Report 2025 may be directed to:
dsinquiries@LEGO.com