

Zivver – Transparency Report 2025

Digital Services Act – Article 15

Reporting period: 1 January 2025 – 31 December 2025

1. Introduction

This report is published by Zivver B.V. pursuant to Article 15 of Regulation (EU) 2022/2065 (Digital Services Act). Zivver qualifies as a hosting service as defined in Article 3(g) DSA. Zivver does not operate an online platform within the meaning of Article 3(i) DSA. The report covers content moderation actions, notices received, enforcement measures, automated tools used, and orders from public authorities during the 2025 reporting period.

2. Internal Content Moderation Policies

Zivver's services are designed around strong security, privacy-by-design and data protection by default. Zivver's architecture ensures that Zivver personnel do not have access to readable customer content during normal operations. Customer content is stored encrypted, and Zivver does not maintain processes or systems that allow employees to decrypt or review user messages and files. While certain technical processes (such as automated DLP scanning) may temporarily process data in RAM, this does not result in any stored readable content or human access. Zivver does not assess, filter or remove user content on the basis of its substance or legality, and does not proactively monitor user content, in line with Article 8 DSA.

3. Notice-and-Action Mechanism (Article 16 DSA)

Zivver can receive notices of allegedly illegal content through its support and legal contact channels. Such notices must include the location of the content, a description of the alleged illegality, and the applicable legal basis.

Sufficiently precise notices would be assessed by Zivver's Security and Legal teams, and appropriate action would be taken where required. No such notices were received in 2025.

2025 results:

- Notices received: 0
- Actions taken due to notices: 0

4. Actions Taken on Users or Content

Zivver may suspend or restrict accounts for security reasons or misuse prevention.

2025 results:

- User account suspensions/restrictions: fewer than 10 (all security-related)
- Content removals: 0
- Other enforcement measures: 0

5. Complaints and Appeals (Article 20 DSA)

During the reporting period, Zivver did not operate a dedicated internal complaint-handling mechanism as foreseen under Article 20 DSA for users to contest moderation decisions. Zivver did not receive any complaints relating to moderation actions in 2025.

2025 results:

- Complaints received: 0
- Decisions overturned: 0

6. Orders from Public Authorities (Articles 18 and 19 DSA)

All orders received are reviewed by Legal & Compliance for scope and validity.

2025 results:

- Orders to act against illegal content: 0
- Orders to provide user information: 0

7. Automated Tools Used (Article 15(1)(e) DSA)

Zivver uses automated tools solely for security and abuse-prevention purposes, including the detection of compromised accounts, unusual authentication patterns, malicious traffic and abnormal sending behaviour. These tools do not assess the legality of content and do not perform content moderation within the meaning of the DSA. Automated security measures may lead to temporary restrictions (for example, login blocking or rate-limiting), but these are not accompanied by DSA Article 17 “Statements of Reasons”. Zivver classifies email content based on certain elements and may amend content if it is deemed insecure under Zivver’s rules. This classification supports users in sending information securely; it is not intended to moderate or restrict users’ freedom of expression.

8. Measures Against Misuse (Article 23 DSA)

Zivver employs technical and organisational safeguards such as rate-limiting, MFA, anomaly detection, and temporary suspension of compromised accounts. No abusive or manifestly unfounded reporting patterns were identified in 2025.

9. Small Enterprise Exemption (Article 15(2) DSA)

Zivver B.V. does not rely on the small-enterprise exemption and therefore applies the full transparency reporting obligations.

10. Summary Table of 2025 Metrics

Category	2025 Result
Notices of alleged illegal content	0
Actions taken due to notices	0
User account suspensions/restrictions	<10
Content removals for illegality	0
Complaints submitted ¹	0
Decisions overturned	0
Orders under Article 18	0
Orders under Article 19	0
Use of automated tools	Yes – security only

11. Contact Information (Articles 11 and 12 DSA)

Zivver en Zivver Holding B.V.
Attn: Legal & Compliance / DSA Contact Point
Spaklerweg 52
1114 AE Amsterdam-Duivendrecht
The Netherlands

Email: legal@zivver.com

¹ Zivver did not establish a formal DSA complaint mechanism in 2025