Vestiaire Collective

Digital Services Act Transparency Report 2025

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17 February 2024 to 16 February 2025

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Vestiaire Collective

Introduction

Since 2009, Vestiaire Collective has built a global community of buyers and sellers, motivated by a shared mission to **transform the fashion industry** for a **more sustainable future**, advocating for the **circular fashion movement** as an alternative to overproduction, overconsumption, and wasteful industry practices.

At Vestiaire Collective, **Trust** is a core brand pillar and ensuring our platform is a safe and trusted place to buy and sell pre-loved luxury and designer fashion is critical to our mission.

Today, Vestiaire Collective provides access to the world's largest collection of pre-loved luxury and designer fashion, with over 12,000 brands on sale, 5 million listings live, and more than 30,000 new items added every single day. Our European community is made up of over 7.68 million active users¹.

To support this growing user base, our Trust team of authentication, quality control, curation, fraud, product/technology, security, data, payments and operations experts are dedicated to keeping Vestiaire Collective's marketplace safe by enforcing our policies and removing potentially illegal or prohibited items.

The purpose of this report is to comply with Vestiaire Collective's disclosure and transparency obligations under the European Union's Digital Services Act (**DSA**). DSA regulates online intermediaries and platforms such as marketplaces and harmonizes the obligations for all online platforms in the EU to reinforce the safety and trustworthiness of the online space.

This report, covering the period 17 February 2024 to 16 February 2025 (**Reporting Period**), provides an overview of the actions taken to enforce our platform rules, address potential infringements of intellectual property rights and respond to government orders.

Date of publication: 2nd April 2025

Period covered by the Report: 17th February 2024 to 16th February 2025

¹ Average monthly active recipients of the service in the EU, calculated as an average over the past six months. **Vestiaire Collective 2025 Transparency Report**

Platform Monitoring and Enforcement of Platform Rules

We expect every user to follow our platform rules and policies. We strive to write our policies as clearly as possible to help our members around the world understand their rights and responsibilities when using Vestiaire Collective.

When users register and buy/sell on our platform, they commit to following our platform rules, including our <u>Terms of Use</u>, <u>Seller T&Cs</u>, <u>Buyer T&Cs</u>, <u>Catalogue Rules</u>, <u>Listing Guidelines</u> and <u>Buyer-Seller Chat Rules</u>.

Our Trust team is dedicated to detecting potential content violations and enforcing our policies when items or user accounts are flagged for contravening our platform rules. This includes actions such as listing illegal or prohibited products.

Our team uses a combination of automated systems and human review to monitor and remove policy-violating listings and users. Reports from our community of members and brands are also an integral part of our process.

We strive to consistently enforce our policies and hold all users accountable to the same standards to strengthen trust in our community and maintain the integrity of our platform.

Vestiaire Collective provides the information below in response to article 15 of the DSA. This section reports information regarding content moderation and enforcement actions that Vestiaire Collective has engaged in on its own initiative, including actions taken following a report or complaint by a user or other third party. Actions taken following an order or official request from a governmental authority are outlined in the section titled "Government Orders".

Platform monitoring

At Vestiaire Collective, we go beyond traditional processes to detect illegal and prohibited products and fraudulent and high-risk users. Our team leverages a combination of human-expertise and technology (including the use of third-party and proprietary software and algorithms) to ensure a high degree of accuracy:

- Machine learning-based algorithms
- Authentication technology (e.g. RFID readers)
- Artificial Intelligence (AI) systems

Diagram 1. Vestiaire Collective approach to platform monitoring

	PRE PUBLICATION	POST PUBLICATION	
ITEMS	Digital Verification blocking high-risk items based on image analysis	Physical Authentication & QC blocking illegal and prohibited items before shipping Return process for buyers Community raising alerts on suspected illegal or prohibited items Catalogue monitoring by Curation and Trust teams	
USERS	Automated closure of fraudulent accounts and repeat offenders Manual review of high-risk accounts may lead to closure	Automated closure of fraudulent accounts and repeat offenders Community raising alerts on suspicious or non-compliant users Fraud reviews on high-risk accounts	

Vestiaire Collective's curation and fraud specialists constantly monitor the platform to ensure the product listings and users comply with our platform rules. Unlike some other marketplaces, Vestiaire Collective is a *curated* marketplace, meaning that every product listing must pass a review process prior to going live on the platform.

Where necessary, our teams take enforcement actions to block or restrict use of the platform (content moderation activities), namely:

- rejecting or removing a product listing;
- closing a user account; and/or
- banning (permanently or temporarily) a user from Buyer-Seller chat.

At Vestiaire Collective, we hire individuals with diverse professional experience and educational backgrounds. All Trust team members (including our curation and fraud specialists) go through robust training at onboarding, followed by regular ongoing and ad hoc training. Our specialists also have access to Vestiaire Collective's self-guided internal training portal. When there are updates to policies, further training is provided.

In order to help ensure that we consistently make fair and accurate decisions on specific cases, our specialists can always ask questions to their team leads or escalate more complex requests to other relevant experts as required.

Use of automated tools

We use automated tools to identify and deactivate fraudulent accounts without an initial manual review or user report. These automated tools are calibrated to detect fraud patterns based on behaviour observed by our fraud team. We also use automated tools to flag high-risk product listings for manual review before any enforcement action is taken.

While these automated systems allow us to review the millions of accounts and product listings on the platform, human reviews and other safeguards are critical to ensuring those decisions have a high level of accuracy.

We allow users to appeal a decision if they believe the decision is incorrect; and we regularly retrain our system to reflect changes in fraud and other behavioural patterns over time.

The table below reports estimated error rates of our automated system globally.

Table 1. Automated tools

Tool	Qualitative description	Specification of the precise purposes	Estimated error rate	Safeguards applied
CRIME Algorithm	Counterfeit product listing detection	Measurement of counterfeit risk of each user-uploaded product listing	0.1%	 Digital verification team processes all items flagged by CRIME prior to publication Ability to contact Vestiaire Collective Customer Service team
Sift	Fraudulent account detection	Assesses fraud risk of accounts at registration, log in, account update and product listing	1.2%	 Automation limited to high risk assessment Manual review before action taken for medium risk Any deactivated customer has ability to contact Vestiaire Collective Customer Service team Manual review of decision by Fraud team expert
CHAMO Algorithm	Chat moderation risk measurement	According to the risk score generated by CHAMO, messages are blocked and/or users can be banned to ensure compliance with Buyer-Seller Chat Rules	4.0%	 Manual moderation after CHAMO decision (un-ban action if the initial decision was incorrect) Ability to contact Vestiaire Collective Customer Service team

In some cases Vestiaire Collective utilises automated tools to queue content for human review. We do not calculate an error rate for these systems as they do not make moderation decisions or apply enforcement actions to content – whether a product listing or user account violates our policies is determined by Vestiaire Collecitve human reviewers within our curation, fraud and payments teams.

Product listing reports on Vestiaire Collective

Under Vestiaire Collective's Catalogue Rules, the following items are prohibited:

- Counterfeit items and any item that infringes a third party's intellectual property rights, including authentic items with counterfeit elements (e.g. authentic bag with imitation handle or strap)
- Replicas, dupes or imitations of genuine products
- Fast fashion brands on the List of Banned Fast Fashion Brands
- Extra items that were not initially offered for individual sale, including packaging (e.g. dust-bag), spare parts (e.g. padlock, locks/keys) and items not authorized for resale (including prototypes, runway or showroom items, samples, uniforms)
- Other non-compliant items include modified items (such as watches with non-genuine parts), lifestyle items (e.g. sporting and home textile items), connected items (e.g. smart watches and rings), precious metals and jewelry without required hallmarks, items with fur or exotic material or items subject to import/export restrictions or exceeding transport size restrictions.

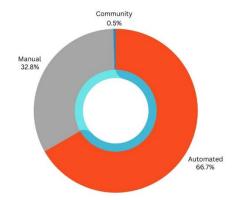
If we determine that a product listing violates our platform rules, we'll remove the item from the marketplace and notify the seller. In some cases, and with sellers who repeatedly violate our policies, we'll permanently close or deactivate their account.

During the Reporting Period, we took enforcement action against 1,560,616 items in total.

Enforcement actions against product listings – by source

- 66.7% (1,041,628 items) were flagged/reported by Vestiaire Collective's automated systems
- 32.8% (511,219 items) were flagged/reported by Vestiaire Collective's manual processes
- **0.5**% (7,799 items) were flagged/reported by our community

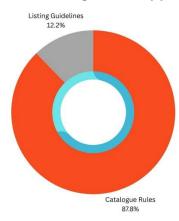
Chart 1. Product listing actions, by source



Enforcement actions against product listings – by policy violation

- **87.8**% (1,370,064 items) violated our Catalogue Rules
- **12.2**% (190,582 items) violated our Listing Guidelines

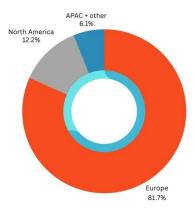
Chart 2. Product listing actions, by policy violation



Enforcement actions against product listings – by region

- **81.7**% (1,275,099 items) were listed by users based in Europe,
- **12.2**% (190,365 items) were listed by users based in North America
- 6.1% (95,182 items) were listed by users based in APAC and other countries

Chart 3. Product listing reports, by region



Report an Item feature

Reports generated by our community of users and luxury and fashion brands is an important part of our platform monitoring and enforcement process. As part of the implementation of the DSA compliance program, we enhanced our member reporting tools and updated the report template to better align with our platform rules.

Our Report an Item feature empowers members of the Vestiaire Collective community to report product listings that:

- include content which is offensive or inappropriate;
- are prohibited according to Vestiaire Collective's Catalogue Rules;
- provide a misleading or inaccurate item description; and/or
- are suspected counterfeits or replicas.



User account-related reports on Vestiaire Collective

User accounts are regularly screened for fraudulent and other prohibited activity. In addition, we (and our payment service providers) verify user profiles in accordance with relevant regulations.

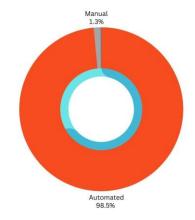
If we determine that a user account is fraudulent or repeatedly violates our policies, we'll permanently close or deactivate their account.

During the Reporting Period, we took enforcement action against **947,175** user accounts in total.

Enforcement actions against user accounts - by source

- 98.5% (933,371 user accounts) were flagged/reported by Vestiaire Collective's automated systems
- 1.3% (12,259 user accounts) were flagged/reported by Vestiaire Collective's manual processes
- 0.2% (1,545 user accounts) were flagged/reported by our community

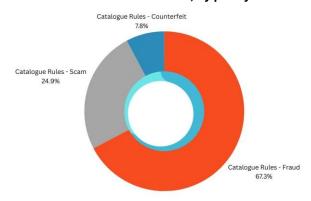
Chart 4. User account actions, by source



Enforcement actions against user accounts – by policy violation

- 67.3% (637,575 user accounts) violated our Catalogue Rules (fraudulent activity)
- 24.9% (236,099 user accounts) violated our Catalogue Rules (scam activity)
- 7.8% (73,501 user accounts) violated our Catalogue Rules (counterfeiting activity)

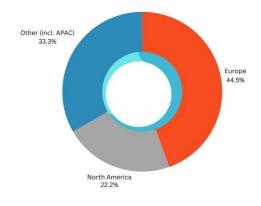
Chart 5. User account actions, by policy violation



Enforcement actions against user accounts - by region

- 44.5% (421,517 user accounts) were based in Europe
- **22.2**% (210,086 user accounts) were based in North America
- **1.8**% (17,409 user accounts) were based in APAC
- **31.5**% (298,163 user accounts) were based in other countries

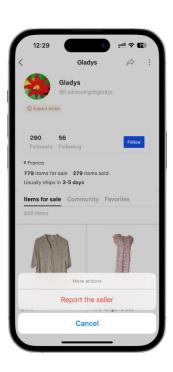
Chart 6. User account actions, by region



Report a User feature

Our Report a User feature empowers members of the Vestiaire Collective community to report other users who:

- try to make contact or complete a transaction outside of the Vestiaire Collective platform;
- engage in harassment or spamming of other users;
- use abusive or threatening language;
- · discriminate against other users; or
- include explicit imagery in product listings or profile pages.



Buyer-Seller chat moderation

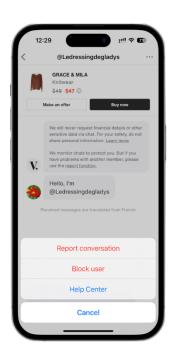
Even prior to the introduction of the DSA, users of the Buyer-Seller Chat function had the ability to report inappropriate behaviour. Since the DSA commencement in February 2024, we have enhanced this feature and increased our monitoring of the chat to ensure compliance.

Users found to be violating our Buyer-Seller Chat Rules receive an initial ban of 24 hours, after which they may be permanently banned from using the chat function.

Vestiaire Collective is copied into every chat on our platform, and may monitor conversations for fraud, safety, and service quality in accordance with our <u>Privacy Policy</u>.

The following information, behaviour and content is prohibited on Buyer-Seller Chat:

- Personal information or data financial information, postal addresses, telephone numbers, social media handles etc;
- Inappropriate content sexually explicit material or language;
- Threatening language or behaviour racist, discriminatory, abusive, or hateful material, including any language which incites or encourages violence against others; and
- Spam repetitive and insistent messaging, requests to share personal details or information.



Enforcement actions – Buyer-Seller Chat

With respect to the **118,921** users against whom we took enforcement action during the Reporting Period due to violation of our Buyer-Seller Chat Rules:

- **64.8**% (77,029 users) were flagged/reported by Vestiaire Collective's automated systems, **31.9**% (37,882 users) were flagged/reported by Vestiaire Collective's manual processes, and **3.4**% (4,010 users) were flagged/reported by our community;
- **63.0**% (74,911 users) violated our rules against platform circumvention, **35.9**% (42,692 users) violated our rules against scams/fraud, and **1.1**% (1,318 users) violated other policies; and
- 77.5% (92,163 users) were based in Europe, 18.0% (21,405 users) were based in North America, and 4.5% (5,380 users) were based in APAC and other countries.

Protecting our community from spam and scam messages is a key area of focus. We regularly remind our community through email, in-app notifications and other communications to take the appropriate steps to maintain their account security.

Measures and protection against misuse

In compliance with article 23 of the DSA, Vestiaire Collective may suspend, for a reasonable period of time and after having issued a prior warning, the provision of its services to users that frequently provide manifestly illegal content, and to individuals or entities or complainants that frequently submit notices or complaints that are manifestly unfounded.

- Number suspensions enacted for the provision of manifestly illegal content: 0 (only permanent bans or warnings/user education).
- Number of suspensions enacted for the submission of manifestly unfounded notices: 0 (only warnings).
- Number of suspensions enacted for the submission of manifestly unfounded complaints: 0 (only warnings).

Complaints relating to Vestiaire Collective's enforcement actions

In accordance with Article 20 of the DSA, Vestiaire Collective provides users with access to our internal complaint-handling system, which enables users to lodge complaints against enforcement and content moderation decisions taken by Vestiaire Collective.

During the Reporting Period, Vestiaire Collective received a total of **66,305** complaints:

- With respect to decisions taken to reject or remove a product listing, 23,226 user complaints were received. In 3,040 cases it was decided to reverse our initial decision (representing 0.2% of overall enforcement actions taken against product listings).
- With respect to decisions taken to permanently close a user account, 22,042 complaints were received. In 8,896 cases it was decided to reverse our initial decision (representing 0.9% of overall enforcement actions taken against user accounts).
- With respect to decisions taken to ban (temporarily or permanently) a user from Buyer-Seller Chat, 14,339 user complaints were received. In 9,914 cases it was decided to reverse our initial decision (representing 8.3% of overall enforcement actions taken to ban users from Buyer-Seller Chat).

The average (median) time taken to resolve these complaints was less than 48 hours.

During the Reporting Period, there were no complaints or reports submitted to out-of-court dispute settlement bodies with respect to Vestiaire Collective's enforcement actions or content moderation actions.

Intellectual Property Enforcement

As a marketplace for the world's best-known luxury brands, Vestiaire Collective takes intellectual property (**IP**) rights seriously. We require sellers to comply with our Seller T&Cs and Catalogue Rules which specifically prohibit the listing of products which infringe the intellectual property rights of third parties, including counterfeits, replicas, and dupes/imitations of genuine products.

Our curation and legal teams are responsible for reviewing reports of alleged IP infringement. Under our policies, rights-holders (or their authorized representatives) can submit IP infringement reports identifying products or content that they believe infringes their rights via the *Report an Item* feature or directly with the legal team. Vestiaire Collective is committed to quickly removing any reported listings that do not comply with our platform rules, as well as clearly communicating actions taken as a result to affected users and third parties.

During the Reporting Period, Vestiaire Collective processed **12,142** alleged IP infringement reports. The majority (approximately 70.8%) of all reports we received were submitted through the *Report an Item* feature. During the Reporting Period, 90% of IP infringement reports were actioned within 48 hours.

We rejected a total of 4,163 (34.3%) IP infringement reports during the Reporting Period. Vestiaire Collective may reject a report of infringement of intellectual property rights if we're unable to verify that the person submitting the report is authorized to act on behalf of the intellectual property owner, when the description of the intellectual property is insufficient, when the infringement is not substantiated, or when the report otherwise fails to comply with our requirements.

We also continued to scale and enhance our anti-counterfeiting program through innovative products and technologies.

During the Reporting Period, we closed 73,501 seller accounts for repeat infringement and/or counterfeiting violations. Tackling counterfeit items continues to be a top priority for our Trust team and we'll continue to partner with brands to remove suspected counterfeit goods, and leverage technology to more quickly detect and remove those listings.

Government Orders

Vestiaire Collective provides the information below in response to article 15(1)(a) of the DSA. This section provides information on orders and official requests from EU Member State government authorities to:

- (1) remove illegal content from the platform (removal orders); and
- (2) provide user account information for civil, administrative, criminal, and national security purposes (user data disclosure orders).

Each order or request is carefully reviewed to ensure it complies with applicable laws.

Removal orders

No removal orders were received during the Reporting Period.

User data disclosure orders

Vestiaire Collective provided user account information in response to 47 of the 55 orders and official requests we received from EU Member State government authorities. Such orders and requests involved information relating to one or more users, transactions, listings, and other content on the platform.



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