

DSA Transparency report for Kahoot! AS

Publishing date

April 16th 2025

Reporting period

February 17th 2024 to February 16th 2025

REPORT INDEX

1	Introduction	2
2	Content moderation at Kahoot!	2
3	NOTICES OF ILLEGAL CONTENT	4
4	Orders received from EU member states' authorities to take action on illegal content	4
5	Information orders received from EU member state national authorities	5
6	Suspensions imposed due to illegal content etc.	5
7	Disputes submitted to out-of-court dispute settlement bodies	5



1 INTRODUCTION

Kahoot! is a game-based learning platform that allows users to create, share, and play educational games and quizzes. Our mission is to make learning fun and engaging for everyone, fostering creativity and collaboration among users worldwide.

We're on a mission to make learning awesome – and we work hard to maintain a safe and welcoming platform where anyone can come and learn while having fun. We maintain rules and guidelines to ensure a safe and respectful environment for all of our users and take action against content that violates these rules and guidelines or applicable law. Kahoot!'s rules and guidelines applicable to content on our platform are set out in Kahoot!'s <u>Acceptable Use Policy</u>, <u>Safety Guide for Content</u> and <u>Editorial Guidelines</u> (together referred to as our "**Platform Rules**"), all of which are incorporated into the Kahoot! <u>Terms and Conditions</u>.

This report is prepared to meet the transparency reporting requirements to which we are subject under the DSA. The information provided herein applies to the game-based learning platform provided by Kahoot! AS and branded as Kahoot!. We are in the process of implementing the template established by the EU's Implementing Regulation (EU 2022/2065) by July 1, 2025.

For more information relating to our compliance with the DSA, please see our <u>DSA page</u>.

2 CONTENT MODERATION AT KAHOOT!

2.1 Platform Rules

Our Platform Rules describe what content is not allowed on Kahoot!. This includes, but is not limited to, content that:

- involves illegal, threatening, defamatory, abusive, harassing, degrading, intimidating, fraudulent, deceptive, invasive, or racist elements
- uses any suggestive, inappropriate, or explicit language
- infringes on any trademark, patent, trade secret, copyright, or other proprietary rights of any party
- involves unauthorized or unsolicited advertising
- impersonates any person or entity, including any Kahoot! AS employee or representative

We have also established an information page concerning inappropriate content.

2.2 Content moderation practices

Our <u>Safety Guide</u> gives insight into how Kahoot! works with platform safety and the measures we implement to keep our platform safe, including how we moderate content.

At a high level, the safety and moderation efforts we have implemented include:

1) **Moderation by our moderation team:** We have a team of trained moderators whose bespoke role is to filter out inappropriate content.



- 2) **Flagging:** We rely on our community to help us keep the platform safe, and provide a flagging mechanism which allows account holders to flag individual public kahoots which they consider to include illegal or inappropriate content. Content flagged by end users will be reviewed and assessed by our moderator team.
- 3) **Customer service response:** Users may always reach out to our customer service team to notify us about content that they believe is inappropriate and in breach of our Platform Rules. As described in our Acceptable Use Policy, DMCA notices and counter-notices, as well as any other copyright violation notices, can be sent directly to legal@kahoot.com.
- 4) **Nickname generator:** We offer a nickname generator which suggests friendly nicknames to the players instead of them creating their own nickname. Where the nickname generator is not used and a participant has set an inappropriate nickname, the game host may kick out the participant.
- 5) **Automated filtering software:** We rely on automated filtering software to block inappropriate content based on a regularly updated list of keywords that are commonly associated with harmful intent.
- 6) Verified creators: Creators on the Kahoot! platform can apply to become verified creators. In order to become a verified creator on Kahoot!, the end user's profile and content are evaluated by a specialised team for compliance with Kahoot!'s policies and guidelines as well as their learning value and quality. Verified creators' content is marked with a red checkmark. While this verification process helps highlight high-quality content, it does not guarantee the absence of inappropriate material, and all content, including that from verified creators, remains subject to moderation. Violations may result in the revocation of the creator's verified status.

Kahoot! is committed to ensuring that our team of trained moderators is well-equipped to assist in keeping our platform safe and effectively filter out inappropriate and illegal content. To achieve this, we provide regular training sessions and workshops that cover our Platform Rules and any updates thereto, as well as best practices with respect to online safety and content moderation methods. We have also implemented policies and guidelines to assist the team in their review and determination of how to handle flagged/filtered and inappropriate content. We encourage open communication among our moderators to share insights and seek support on challenging assessments, ensuring a consistent approach to content moderation across the platform.

As noted above, Kahoot! utilizes automated filtering software to identify and block inappropriate content on our platform. This technology continuously scans for keywords in multiple languages that are commonly associated with harmful intent, helping us to detect content that violates our Platform Rules and applicable law. We regularly update our keyword list to minimize error rates and to enhance the effectiveness of our moderation efforts. Safeguards are in place to ensure that all filtered content is reviewed by our moderation team, maintaining a balance between automated detection and human oversight. Filtered content undergoes manual review by our moderation team within a short time (normally within 24 hours). The potential outcomes of this review is described in section 2.3 below.

2.3 Measures against content violating the Platform Rules or applicable law

Kahoot! takes action against content that Kahoot! considers to violate the Platform Rules or applicable law. Once content has been flagged, it can result in one of the following outcomes:



- Whitelisted: If the content is found to be appropriate and in line with our Platform Rules and applicable law, it may be approved and can be made publicly accessible again. This can occur if, after a review, the flagged content is found to be acceptable or if the content has been modified by the creator to meet our standards.
- 2) **Quarantined:** If the content is found to violate our Platform Rules or applicable law, the content is temporarily removed and not playable. However, the creator can always modify the content to resolve the issue that led to the quarantine.
- 3) **Made private:** In cases where the content is not severe enough to warrant quarantine but still does not fully align with our Platform Rules, it may be made private. An example of this might be content that is subjectively misinforming. This allows the creator to host the kahoot in a private setting or share it with select friends, but it will not be available for public access.
- 4) **Suspension:** Kahoot! reserves the right to terminate the accounts of users who breach our Platform Rules or applicable law, and/or to suspend their access to the platform. We will suspend service provision to users who frequently provide manifestly illegal content.

Our content moderation team evaluates each case to determine its specific outcome.

3 NOTICES OF ILLEGAL CONTENT

The table below is responsive to Article 15 (b) DSA and sets out details regarding our moderation efforts during the reporting period.

Flagging		End result	
Total number of kahoots moderated during the reporting period	193993	Number of kahoots that were quarantined during the reporting period	49576
Number of kahoots flagged by end users during the reporting period	74809	Number of kahoots that were whitelisted during the reporting period	113572
Number of flagged kahoots related to alleged IPR violations	<50		
Number of kahoots flagged by our automatic text moderation during the reporting period	119184	Number of kahoots that were approved because they were kept private (not made public) during the reporting period	30784

4 ORDERS RECEIVED FROM EU MEMBER STATES' AUTHORITIES TO TAKE ACTION ON ILLEGAL CONTENT

Kahoot! follows up on orders from EU member states' authorities to act against illegal content on the platform. Upon receipt of such an order, Kahoot! reviews whether the content in question violates the Platform Rules or other applicable law. If the content is found to violate the aforementioned rules and policies, Kahoot! takes appropriate action against the content.



Kahoot! ensures that the issuing authority is promptly informed of the actions taken in response to their order.

Below is an overview of orders we have received from EU member state authorities to take action on alleged illegal content.

Issuing EU	Number of orders	Category of illegal	Median time to	Median time
member state		content	confirm receipt	to give effect
			of the order	to the order
N/A	0	N/A	N/A	N/A

5 INFORMATION ORDERS RECEIVED FROM EU MEMBER STATE NATIONAL AUTHORITIES

Kahoot! responds to information requests about specific users from EU member state judicial or administrative authorities in accordance with applicable EU law and national law.

Below is an overview of information orders that we deem responsive for the purpose of Article 15 DSA.

Issuing EU member state	Number of orders	Category of illegal content	Median time to confirm receipt of the order	Median time to give effect to the order
N/A	0	N/A	N/A	N/A

6 SUSPENSIONS IMPOSED DUE TO ILLEGAL CONTENT ETC.

In accordance with Article 23 of the Digital Services Act (DSA), Kahoot! is required to suspend service provision to users who frequently provide manifestly illegal content, and to suspend the processing of notices and complaints from individuals or entities that frequently submit manifestly unfounded notices or complaints. Such suspensions are enacted after issuing a prior warning.

The table below presents an overview of the number of suspensions imposed pursuant to this article.

Suspensions due to manifestly illegal content	Suspensions due to manifestly unfounded notices/complaints
0	0

7 DISPUTES SUBMITTED TO OUT-OF-COURT DISPUTE SETTLEMENT BODIES

Kahoot! users in the EU are entitled to select any out-of-court dispute settlement body ("**ODSB**") that has been certified in accordance with Article 21 (3) DSA in order to resolve disputes relating to any decision by Kahoot! regarding:

1) the removal or restriction of information provided by the user;



- 2) the suspension or termination of the user's account or access to the Kahoot! service (in whole or part); or
- 3) the suspension, termination or restriction of any ability to monetize information provided by the user

where Kahoot! has taken that decision on the basis that the information provided by the user is illegal or in violation of Kahoot!'s Platform Rules.

The information set out below is responsive to Article 24 (a) DSA and relates to disputes submitted to the ODSBs referred to in Article 21 DSA.

The number of disputes submitted to the ODSB	The outcomes of the dispute settlements	The median time needed for completing the dispute settlement procedures	The share of disputes where Kahoot! implemented the decisions of the ODSB
0	N/A	N/A	N/A
0	N/A	N/A	N/A