

# Digital Services Act – Transparency Report

June 2026

## Table of Contents

Introduction.....	2
Monthly Active Users in the EU .....	2
Content Moderation following a User Report.....	3
Content Moderation at BERNINA’s Initiative.....	5
Content Moderation Appeals .....	6
Out-of-Court Settlement Body Disputes.....	7
Government Requests.....	8

## Introduction

BERNINA International AG has been one of the world's leading sewing and embroidery machine manufacturers since 1893. The Swiss family-owned company's products are synonymous with innovation and precision. Above all, they are known for their durability. BERNINA sewing machines are used worldwide by people with a passion for sewing.

The BERNINA headquarter is located in Steckborn, Switzerland. Among other things, BERNINA's digital marketing services are operated here and made available to a global audience, including citizens resident in the EU. According to a self-assessment, BERNINA is subject to the requirements of the EU Digital Services Act with its digital offerings and has summarized all relevant information at <https://www.bernina.com/digital-services-act>.

BERNINA operates several webservices that address EU customers: [bernina.com](https://www.bernina.com), [blog.bernina.com](https://blog.bernina.com), [inspiration.bernina.com](https://inspiration.bernina.com), [kurse.bernina.com](https://kurse.bernina.com), [bernette.com](https://bernette.com), [berninastores.ch](https://berninastores.ch), [bernetteshop.nl](https://bernetteshop.nl). On the BERNINA blog ([blog.bernina.com](https://blog.bernina.com)), users can upload their own content and share it with the public. The blog is therefore classified as an online platform. BERNINA operates another blog with similar functionality under [weallsew.com](https://weallsew.com), which, however, directly addresses users within the United States of America and therefore is not subject to the EU Digital Services Act.

This document fulfills the obligation resulting from Article 24 to prepare a yearly Transparency Report. This report, published in June 2026, covers the period from 01.06.2025 to 31.05.2026.

## Monthly Active Users in the EU

The average number of monthly active recipients of the services in the EU in the past six months in accordance with Article 24(2) DSA was considerably lower than the applicable threshold of 45 million recipients of the service.

## Content Moderation following a User Report

### User reporting flow

To report content, users can submit a dedicated form or an email. Both options are linked from <https://www.bernina.com/digital-services-act>.

When users report content, those reports are sent for review and are resolved by BERNINA's Content Moderation team, discussed below. Users receive notification once their report has been resolved. This notification also informs them whether or not their request has been granted. Content reported this way is reviewed manually, there are no automated tools in place to process these user reports.

In addition, users can report user generated content on the blog (both comments and posts within the gallery) anonymously by clicking a dedicated link below the respective content. Once a certain threshold of such reports has been reached, the respective content automatically gets unpublished and is set to "manual review". If the content passes the manual review, it is republished and marked as "moderated." Users can no longer report it. This reporting feature is protected against abuse by bots using a CAPTCHA solution.

### BERNINA's Content Moderation team

As of 31.05.2026, BERNINA had 4 content moderation teams. They were located in Switzerland, the Netherlands and France. These personnel review content reported by users, comments marked as spam by BERNINA's automated spam detection mechanism, and reporter and author appeals, based on BERNINA's policies.

The BERNINA Blog is currently available on four instances which differ in the language of the content provided: English, German, Dutch and French. Each instance is managed by at least one person who speaks the respective language fluently, in most cases by native speakers. For situations where a content moderator lacks language proficiency, moderators use translation services to complete the review.

### User reporting metrics

BERNINA provides the information below in response to DSA Article 15(1)(b). This section reports data regarding content moderation based on a user's report.

During the reporting period, BERNINA received in total 1 report from external users. The tables below illustrate the number and kind of actions taken, based on those reports, and the median time to give effect to the requests.

## Content moderation appeals and subsequently taken actions

### Based on law

	German Blog	English Blog	Dutch Blog	French Blog
Edited Community Posts	0	0	0	0
Removed Community Posts	0	0	0	0
Edited Comments	0	0	0	0
Removed Comments	0	0	0	0
Deleted Users from Blog User Management	0	0	0	0
Deleted Users from BERNINA CRM / Azure	0	0	0	0

### Based on BERNINA GTC

	German Blog	English Blog	Dutch Blog	French Blog
Edited Community Posts	0	0	0	0
Removed Community Posts	0	0	0	0
Edited Comments	0	0	0	0
Removed Comments	0	1	0	0
Deleted Users from Blog User Management	0	0	0	0
Deleted Users from BERNINA CRM / Azure	0	0	0	0
<b>Total Number of Actions</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>

## Content moderation appeals: time to give effect

Median time to give effect to the requests (days)

	German Blog	English Blog	Dutch Blog	French Blog
Median time to give effect to the requests (days)	0	1	0	0

## Reports submitted by Trusted flaggers

BERNINA did not receive any reports from Trusted flaggers during the reporting period.

## Reports where action was taken on the basis of the law

BERNINA's policies separately prohibit a wide range of content that also violates the law. In such cases, BERNINA generally relies on its policies as the basis for action.

## Content moderation appeals, by illegal content type

	German Blog	English Blog	Dutch Blog	French Blog
Animal welfare	0	0	0	0
Data protection and privacy violations	0	0	0	0
Illegal or harmful speech	0	0	0	0
Intellectual property infringements	0	0	0	0
Negative effects on civic discourse of elections	0	0	0	0

Non-consensual behavior	0	0	0	0
Pornography or sexualized content	0	0	0	0
Protection of minors	0	0	0	0
Risk of public security	0	0	0	0
Scams and/or fraud	0	0	0	0
Self-harm	0	0	0	0
Unsafe and/or illegal products	0	0	0	0
Violence	0	0	0	0
<b>Total Number of Appeals</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## Content Moderation at BERNINA's Initiative

BERNINA provides the information below in response to DSA Article 15(1)(c). This section reports data regarding content moderation BERNINA engaged in on its own initiative.

During the reporting period, BERNINA took measures on its own initiative in 185 cases, which can be broken down as follows:

<b>Content moderation at BERNINA's initiative and subsequently taken actions</b>	German Blog	English Blog	Dutch Blog	French Blog
Edited Community Posts	3	0	0	0
Removed Community Posts	1	7	1	0
Edited Comments	1	0	0	0
Removed Comments	13	44	21	0
Deleted Users from Blog User Management	0	5	0	0
Deleted Users from BERNINA CRM / Azure	0	0	0	0
<b>Total Number of Actions</b>	<b>18</b>	<b>56</b>	<b>22</b>	<b>0</b>

## Reports where action was taken on the basis of the law

BERNINA's policies separately prohibit a wide range of content that also violates the law. In such cases, BERNINA generally relies on its policies as the basis for action.

<b>Content moderation at BERNINA's initiative, by illegal content type</b>	German Blog	English Blog	Dutch Blog	French Blog
Animal welfare	0	0	0	0
Data protection and privacy violations	0	0	0	0
Illegal or harmful speech	0	0	0	0
Intellectual property infringements	0	0	0	0
Negative effects on civic discourse of elections	0	0	0	0

Non-consensual behavior	0	0	0	0
Pornography or sexualized content	6	0	1	0
Protection of minors	0	0	0	0
Risk of public security	0	0	0	0
Scams and/or fraud	0	0	0	0
Self-harm	0	0	0	0
Unsafe and/or illegal products	0	0	0	0
Violence	0	0	0	0
<b>Total Number of Actions</b>	<b>6</b>	<b>0</b>	<b>1</b>	<b>0</b>

## Automated Measures

BERNINA makes use of automated measures to detect spam comments and trackbacks and prevent their publication, making use of the solution captcha.eu. In addition to that, a dedicated spam detection solution is in place for comments, which does not send any personal information to third party services.

The table below illustrates the amount of automatically detected spam:

<b>Content moderation at BERNINA's initiative based on automated tools</b>	German Blog	English Blog	Dutch Blog	French Blog
Edited Community Posts	0	0	0	0
Removed Community Posts	0	0	0	0
Edited Comments	0	0	0	0
Removed Comments	62	31	24	0
Deleted Users from Blog User Management	0	0	0	0
Deleted Users from BERNINA CRM / Azure	0	0	0	0
<b>Total Number of Actions</b>	<b>62</b>	<b>31</b>	<b>24</b>	<b>0</b>

The blog administrators check this regularly and publish any incorrectly detected content retrospectively.

## Content Moderation Appeals

BERNINA provides the information below in response to DSA Article 15(1)(d). This section reports data on the number of appeals under Article 20 DSA following an enforcement decision by BERNINA.

When BERNINA makes an enforcement decision, the reporter and author generally are notified of the decision and given an opportunity to appeal. Notices are typically sent by email and contain additional information (for example, regarding the content at issue, the policy violated, the action BERNINA has taken, redress information and, in most instances, a note on how to appeal BERNINA's decision). BERNINA reviews

submitted appeals and notifies the user of its appeal decision.

BERNINA did not receive notice of any appeals during the reporting period.

## **Out-of-Court Settlement Body Disputes**

BERNINA provides the information below in response to DSA Article 24(1)(a). This section reports data on the number of out-of-court dispute settlements imposed pursuant to DSA Article 21.

BERNINA did not receive notice of any disputes submitted to out-of-court dispute settlement bodies during the reporting period

## **Account Suspensions**

BERNINA provides the information below in response to DSA Article 24(1)(b). This section reports data on the number of suspensions imposed pursuant to DSA Article 23.

### **Permanent account suspensions due to repeatedly providing policy-violating content**

The metric below reports the number of EU accounts BERNINA permanently suspended during the reporting period due to repeatedly providing policy-violating content, which includes illegal content. In some cases, BERNINA may permanently suspend an account after a single egregious content policy violation (see article 5 in the [terms and conditions of use](#))

Accounts are attributed as EU-accounts based on the self-declared profile location for the account. The metric below does not include account suspensions for reasons other than repeatedly providing policy-violating content – for example, account suspension because the account is fake. Similarly, the metric does not include temporary account suspensions.

BERNINA suspended 5 accounts due to repeatedly providing policy-violating content.

### **Suspension of reporting functionality due to repeatedly submitting manifestly unfounded reports**

The tools provided by BERNINA to request a content moderation are accessible to everyone without technical restrictions for certain users. However, reports of users that repeatedly submitted manifestly unfounded reports are deleted unprocessed over a certain period of time.

All customer reports were processed in the current report period. No reports were not processed.

## **Suspension of appeal functionality due to repeatedly submitting manifestly unfounded appeals**

The tools provided by BERNINA to submit an appeal are accessible to everyone without technical restrictions for certain users. However, appeals of users that repeatedly submitted manifestly unfounded appeals are deleted unprocessed over a certain period of time.

BERNINA did not receive any appeals against any actions taken under this regulation.

## **Government Requests**

BERNINA provides the information below in response to DSA Article 15(1)(a).

This section reports data on requests from member state government authorities: (1) to remove content and (2) to provide user account information. BERNINA carefully considers all government requests for content removal and account information, and works to mitigate any implications they may have on freedom of expression and human rights.

### **Government requests to remove content**

The section below reports information regarding the number of requests BERNINA received from Member State government authorities to remove content during the reporting period, organized by member state and by illegal content type. Government requests to remove content include requests reporting violations of our terms of service or violations of local law.

BERNINA did not receive any government requests to remove content during the reporting period. Because BERNINA did not receive any requests, there is no median time to confirm receipt of the requests or give effect to the requests.