



# WARGAMING.NET

LET'S BATTLE

Regulation (EU) 2022/2065  
(Digital Services Act)

**Transparency Report**

February 2025

Reporting period: 17 February 2024 – 31 December 2024

## Introduction

This transparency report for the period 17 February 2024 to 31 December 2024 has been prepared by Wargaming Group Limited<sup>1</sup> (“**Wargaming**” or “**we**”) in accordance with Article 15 of Regulation (EU) 2022/2065<sup>2</sup> (“**Digital Services Act**” or “**DSA**”).

Wargaming is a leading developer and publisher of massively multiplayer online games.<sup>3</sup> Our products feature chat messages and certain other content provided by users that is available upon login (with minor ancillary exceptions). Most of such content is in text form.

We use a mixture of automated and manual, own initiative and notice-based moderation to minimize the risk of user-generated content that violates our code of conduct or law. We refer to such content as “illegal content” in this report in line with the definition contained in Article 3(h) of the DSA.

This report follows the structure of Article 15 of the DSA, providing information in the same order as required in that Article for better readability and transparency.

If you have any questions about this report, please write to us at:

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Nicosia 1080

Republic of Cyprus

[privacy@wargaming.net](mailto:privacy@wargaming.net)

<https://wargaming.net/support/>

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<sup>1</sup> Wargaming Group Limited is a limited liability company registered in the Republic of Cyprus under the number HE290868 at 105 Agion Omologiton Avenue, 1080 Nicosia, Republic of Cyprus. Website: <https://wargaming.com/>.

<sup>2</sup> The text of the DSA is available at <https://eur-lex.europa.eu/eli/reg/2022/2065/oj>.

<sup>3</sup> World of Tanks, World of Warships, and World of Warplanes (including their console and mobile versions) as well as Bowling Crew. More about our products: <https://wargaming.net/>.

## 1. Orders received from Member States' authorities (Article 15.1(a) DSA).

### Context

This section includes orders received in accordance with Article 9.2(c) and Article 10.2(c) of the Digital Services Act through Wargaming's single point of contact for Member States' authorities, the European Commission, and the European Board for Digital Services established at <https://legal.wargaming.net/en/online-safety/create-ticket?type=authorities> in accordance with Article 11 DSA.

We respond to orders when we have a good faith belief that they are authentic and comply with the applicable EU and national law. In case of orders to provide information, we limit the disclosure to the extend strictly necessary as required by data protection laws. In case of orders to act against illegal content, we always check if the content is still present in our products and remove it as soon as possible.

The numbers below represent the orders received from Member States' authorities under the DSA through the DSA single point of contact.

#### 1.1. The number of orders received from Member States' authorities in accordance with Article 9 DSA ("orders to act against illegal content").

Member State	Type of Illegal Content Concerned	Number of Orders to Act Against Illegal Content
Hungary	Child Safety	1
Germany	Threats and Insults	1
<b>TOTAL:</b>		2

Median time to inform of receipt: automatic instant response.

Median time to give effect to the orders: 15 hours and 8 minutes.

#### 1.2. The number of orders received from Member States' authorities in accordance with Article 10 DSA ("orders to provide information").

Member State	Type of Illegal Content Concerned	Number of Orders to Provide Information
Germany	Threats and Insults	4
<b>TOTAL:</b>		4

Median time to inform of receipt: automatic instant response.

Median time to give effect to the orders: 2 days, 15 hours, and 17 minutes.

## 2. Notices submitted in accordance with Article 16 (Article 15.1(b) DSA).

### Context

Our products contain the following types of content provided by users: chat messages, nicknames, and clan<sup>4</sup> attributes (clan names, tags, logos, descriptions).<sup>5</sup>

Wargaming operates two dedicated channels where individuals and entities, including Trusted Flaggers, may report illegal content: Wargaming Player Support at <https://eu.wargaming.net/support/> and a dedicated DSA reporting form at <https://legal.wargaming.net/en/online-safety/create-ticket?type=players>.

### 2.1. The number of notices

Category of Illegal Content Generated by Users	Number of Notices
Insults and profanity	19,690
Discrimination	4,178
Threats of violence	1,917
Offensive social, religious, or political content	750
Spam	431
Content relating to sex	250
Fraud, scam	248
Other	5,679
<b>Total</b>	<b>33,143</b>

**Note.** These numbers include global (not EU) data for the products “World of Tanks Modern Armor” (console), “World of Warships Legends” (console), and “World of Warships Blitz” (mobile) due to process and system limitations. The total number of notices for these products was 921.

### 2.2. Action taken pursuant to the notices

While we keep detailed records for each of the notices, compiling bulk statistics may be challenging due to process and system restrictions (that we are currently working on).

<sup>4</sup> “Clans” are associations of players in a game, e.g. see <https://worldoftanks.eu/en/content/guide/clans/> or <https://worldofwarships.eu/en/content/education/clans/>.

<sup>5</sup> “Bowling Crew” also contains avatars that are fetched from social media if requested by the user. Inappropriate avatars are replaced with the default image.

We obtained the following approximate data:

Type of Action	Number of Actions
Replacement of inappropriate content	5,236
Suspension of user's ability to provide information ("temporary ban")	20,544
Termination of user's ability to provide information ("permanent ban")	1,481
<b>Total</b>	<b>27,261</b>

### **2.3. Trusted Flaggers**

We have not received any notices from Trusted Flaggers designated under Article 22 of the DSA in the reporting period.

### **2.4. Basis for taking the action**

We always take action based on our terms and conditions contained in the End User License Agreement (EULA)<sup>6</sup> rather than directly on the basis of law. At the same time, section 12.1a of the EULA expressly prohibits any unlawful actions while using our products.

### **2.5. Automated processing**

The percentage of notices processed by automated means in the reporting period was approximately 43%. Please refer to section 5 of this report for more information on automated tools.

### **2.6. Median time needed for taking the action**

The median time to take action in response to notices in the reporting period was 1 hour 24 minutes.

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<sup>6</sup> The EULA is available at <https://legal.wargaming.net/en/user-documents/eula/end-user-license-agreement/view#>.

### **3. Content moderation engaged in at the providers' own initiative (Article 15.1(c) DSA).**

#### **3.1. The use of automated tools**

Wargaming uses both manual and automated tools for own-initiative moderation. We use the following automated tools:

- Automatic replacement of profanity in chats. This tool automatically replaces profanity in chats with neutral symbols in real time.
- Automatic search for profanity in chats. If profanity is identified, the user who posted it is restricted from using the service (typically, suspension of the ability to use chats).
- Automatic search for spam in chats. If spam is identified, the user who posted it is restricted from using the service (typically, termination of the ability to use chats).

#### **3.2. The measures taken to provide training and assistance to persons in charge of content moderation**

We take the following measures to provide training and assistance to persons in charge of content moderation:

- tutorship by experienced colleagues;
- extensive moderation guidelines (both global and locally applicable);
- escalation and cross checks;
- focus on specific products and/or regional markets.

#### **3.3. The number and type of measures taken that affect the availability, visibility and accessibility of information provided by the recipients of the service**

**3.3.1. Chat messages.** The chats that are used during game battles ("battle chats") are automatically deleted after each battle (the standard battle duration is approximately 10-15 minutes). Other chats are designed in such a way that older messages are not visible to the user. Users can also switch off or close chats and restrict who can send them messages.

**3.3.2. Nicknames and clan attributes.** Illegal nicknames and clan attributes are replaced with their default value (default nickname, default clan logo, etc.).

### 1) Clan attributes replacements:

Category of Illegal Content Generated by Users	Number of Replacements
Profanity and insults	29
Offensive social, religious, or political content	26
Impersonation	20
Content relating to sex	10
Content relating alcohol	3
Other	7
<b>TOTAL:</b>	<b>95</b>

### 2) Nicknames replacements: 684.

This content was detected, and the measures were taken, manually.

### 3.4. The number and type of measures taken that affect the recipients' ability to provide information through the service

Category of Illegal Content Generated by Users	Suspensions of the User's Ability to Provide Information ("Temporary Ban")
Profanity and insults	342,909
Insults to moderators	142
Spam	111
Offensive social, religious, or political content	86
Discrimination	42
Threats of violence	35
Scam/Fishing	22
Unfair play	15
Account sale	7
Other	643
<b>TOTAL:</b>	<b>344,012</b>

This content was detected, and the measures were taken, as follows:

- Content detected and measures taken automatically: 380
- Content detected automatically, but measures taken manually: 342,689
- Content detected and measures taken manually: 943

Category of Illegal Content Generated by Users	Terminations of the User's Ability to Provide Information ("Permanent Ban")
Spam	40,822
Scam/Fishing	6,318
Unauthorized ads	4,497
Profanity and insults	11
Soliciting information	9
Threats of violence	6

Offensive social, religious, or political content	2
Insults to moderators	2
Other	21
<b>TOTAL:</b>	<b>51,688</b>

This content was detected, and the measures were taken, as follows:

- Automatically: 36,641
- Manually: 15,047

### **3.5. Basis for taking the action**

We always take action based on our terms and conditions contained in the End User License Agreement (EULA)<sup>7</sup> rather than directly on the basis of law. At the same time, section 12.1a of the EULA expressly prohibits any unlawful actions while using our products.

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<sup>7</sup> The EULA is available at <https://legal.wargaming.net/en/user-documents/eula/end-user-license-agreement/view#>.



#### **4. Complaints received through the internal complaint-handling systems (Article 15.1(d) DSA).**

Complaints against our decisions to remove content may be submitted through Player Support at <https://eu.wargaming.net/support/> by creating a ticket in the “Appeals” category. Alternatively, users may submit appeals through the dedicated DSA reporting form at <https://legal.wargaming.net/en/online-safety/create-ticket?type=players>. The number of appeals during the reporting period was **5,105**.

## **5. Use of automated means for the purpose of content moderation (Article 15.1(e) DSA).**

### **5.1. A qualitative description and a specification of the precise purposes**

We use the following automated tools:

#### **5.1.1. For notice-based moderation of chats:**

- Automatic search for profanity in the reported chat. Purpose: sanctioning profanity in chats. If illegal content is identified, the user who posted it is restricted from using the service (typically, suspension of the ability to use chats). If the tool is unable to process the notice automatically, the notice is processed manually.

#### **5.1.2. For own-initiative moderation of chats:**

- Automatic replacement of profanity in chats. Purpose: filtering out profanity in chats. This tool automatically replaces profanity in chats with neutral symbols in real time.
- Automatic search for profanity in chats. Purpose: sanctioning profanity in chats. If illegal content is identified, the user who posted it is restricted from using the service (typically, suspension of the ability to use chats).
- Automatic search for spam in chats. Purpose: spam prevention. If spam is identified, the user who posted it is restricted from using the service (typically, termination of the ability to use chats).

### **5.2. Accuracy and safeguards**

The automated tools were thoroughly tested for errors and mistakes before implementation. The tools are designed to identify specific illegal content. If such content is present in the chat being checked, it will be detected in 100% of cases.

Users may appeal against restrictions applied to them on our Player Support website in the “Appeals” section.