



Content Moderation Transparency Report
Rortos S. R. L.

Verona, February 11, 2025

Transparency Report on Content Moderation – Rortos

Rortos S. R. L. (hereinafter: “Rortos”) is an Italian company specializing in the development of flight simulators for mobile devices. Founded in 2012, Rortos has become a major player in the mobile gaming market, offering a wide range of simulation products, including civil, military, combat, naval, historical, and helicopter simulators. Rortos develops and distributes its software across all major platforms, including iOS, Android, Steam, Xbox One, and PlayStation 4. Operating as an intermediary service provider and hosting service provider, Rortos enables users to access its digital products through global distribution channels.

Our mission is to deliver the highest quality entertainment to players while ensuring a safe and legally compliant environment for using our services. Rortos is committed to adhering to the provisions of the Digital Services Act (DSA), particularly in terms of ensuring transparency in moderation activities and protecting users.

This report presents information on content reporting and moderation procedures, as well as other aspects arising from the requirements set out in Article 15 of the Digital Services Act.

Proactive Content Moderation

Rortos does not undertake content moderation on its own initiative, focusing exclusively on reports received from users and relevant authorities in accordance with the procedures outlined in this report. However, upon obtaining actual knowledge or awareness of illegal activities or illegal content, Rortos promptly takes action to remove or disable access to such content.

Training and Support for Content Moderation Teams

Individuals responsible for content moderation at Rortos maintain constant communication with the legal department of the corporate group, which provides ongoing support and answers any questions related to applicable laws and the terms of service. This ensures that moderation processes are conducted in compliance with legal and ethical standards.

Types and Number of Moderation Measures

Users of services provided by Rortos have the ability to report illegal content that may violate the law or the terms of service through two main channels:

- Directly within the game, using integrated reporting features (Wings of Heroes);
- Via the official Ten Square Games website, through a dedicated reporting form.

Reports are then reviewed by a dedicated team of specialists from Ten Square Games, which provides customer support and content moderation services for Rortos as part of the corporate group structure. The team takes appropriate moderation actions, such as:

- Content removal;
- Chat restrictions;
- User account suspension.

Impact of Moderation on Content Availability and Visibility

Moderation actions taken by Rortos may affect the availability, visibility, and accessibility of user-generated content by restricting or removing reported content, as well as limiting access to chat functions or user accounts. All these measures are implemented to maintain a safe user environment and ensure compliance with the terms of service and legal regulations.

Breakdown by Type of Illegal Content and Detection Methods

All moderation actions are documented and classified based on the type of reported content (e.g., hate speech, fraud, intellectual property violations) and the method of detection. Rortos relies solely on reports from users and authorities, without employing automated tools for detecting illegal content.

Below is a detailed overview of content moderation practices at Rortos.

Report Identification

Service Provider Name: **Rortos S. R. L.**
Report Date: **February 11, 2025**
Start of Reporting Period: **February 17, 2024**
End of Reporting Period: **December 31, 2024**

Orders Received from Member State Authorities

| | |
|--|-----|
| Number of orders received | 0 |
| Breakdown by authority of the Member State | 0 |
| Breakdown by type of illegal content | 0 |
| Median time to notify about receiving an order | N/A |
| Median time to take action in response to an order | N/A |

Information about notifications received by users

| Type of Information | Value |
|-------------------------------------|-----------------|
| Number of notifications received | 30 ¹ |
| Breakdown by Trusted Whistleblowers | 0 |

Actions Taken in Response to Reports

| Type of Action | Value |
|-----------------------|--------------|
| Content Removal | 7 |
| Chat Restriction | 2 |
| Account Suspension | 0 |
| TOTAL: | 9 |

¹ At this time, due to the current structure of the tools used for content moderation, it is not possible to provide a breakdown of notifications by specific categories of illegal content. However, the company is actively working on improving these tools, and this functionality is expected to be implemented in future reporting. The next transparency report will include detailed data with category-specific breakdowns.

Summary of Actions Taken

| Category | Value |
|---|-------------|
| Number of actions taken based on legal requirements | 0 |
| Number of actions taken based on the Terms of Service | 9 |
| Number of reports processed automatically | 0 |
| Median time to take action | 27,30 hours |

Information on the internal complaints system

| Type of Information | Value |
|-------------------------------|-------|
| Number of received complaints | 0 |