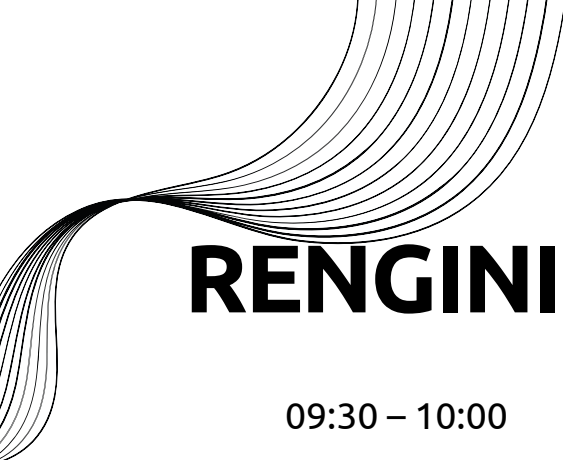




SKAITMENINIŲ PASLAUGŲ AKTAS: ĮGYVENDINIMO AKTUALIJOS

Ryšių reguliavimo tarnyba

2025 m. spalio 15 d.



RENGINIO PROGRAMA

09:30 – 10:00	Registracija, kava
10:00 – 10:20	Skaitmeninių paslaugų akto įgyvendinimas Lietuvoje: aktualijos ir perspektyvos Vygantas Vaitkus , <i>Tarybos narys, RRT</i>
10:20 – 10:50	The European Commission's Role in DSA Implementation Aiga Grisane , <i>DSA Officer, European Commission</i>
10:50 – 11:00	Kavos pertrauka
11:00 – 11:20	TikTok and DSA Compliance Marta Karczewska , <i>Government Relations and Public Policy Manager, Central & Eastern Europe, TikTok</i>
11:20 – 11:50	Skaitmeninių paslaugų akto nurodymų ir skundų mechanizmai: praktinis taikymas Sandra Janulė , <i>Vyriausioji koordinatorė, RRT</i>
11:50 – 12:00	Kavos pertrauka
12:00 – 12:30	Diskusija: Skaitmeninių paslaugų aktas: patirtys, rezultatai ir žvilgsnis į ateitį Vygantas Vaitkus , <i>Tarybos narys, RRT</i> Goda Aleksaitė , <i>Direktorė, VVTAT</i> Aliona Gaidarovič , <i>Priežiūros skyriaus vedėja, ŽEIT</i> Karolina Vilimaitė-Comé , <i>Vyriausioji specialistė, VDAI</i>



DALYVAUJANČIOS INSTITUCIJOS

RRT – Ryšių reguliavimo tarnyba

EK – Europos Komisija

ŽEIT – Žurnalistų etikos inspektorius tarnyba

VVTAT – Valstybinė vartotojų teisių apsaugos tarnyba

VDAI – Valstybinė duomenų apsaugos inspekcija

LRTK – Lietuvos radijo ir televizijos komisija

LB – Lietuvos bankas

NTAKV – Narkotikų, tabako ir alkoholio kontrolės departamentas

EIMin – Ekonomikos ir inovacijų ministerija

URM – Užsienio reikalų ministerija

Virtualus Patrulis

Kriminalinė Policija – Lietuvos kriminalinė policija

NKVC – Nacionalinis krizių valdymo centras

VRK – Vyriausioji rinkimų komisija

KAM – Krašto apsaugos ministerija



SKAITMENINIŲ PASLAUGŲ AKTAS: ĮGYVENDINIMAS IR PERSPEKTYVOS



SPA ĮGYVENDINIMO EKOSISTEMA



SPA valdyba

Europos Komisija

Šalių narių SPK

VLOPs/VLOSEs

Lietuvos
tarpininkavimo
paslaugų teikėjai

Kiti
tarpininkavimo
paslaugų teikėjai

Kompetentingos institucijos:

VDAI
VVTAT
ŽEIT

Nurodymus teikiančios institucijos:

LRTK
Policija
Lietuvos bankas
Narkotikų, tabako ir alkoholio
kontrolės departamentas
Teismai
Kitos

SPK - RRT



Pilietinės
visuomenės atstovai

Patikrinti tyrėjai
Nuo 2025 m. lapkričio
mėn.

Patikimi pranešėjai
Debunk
PiracyMeter
Croplife Lietuva

Subjektai,
nagrinėjantys
ginčus ne teismo
tvarka (ODS)

Paslaugų gavėjai

SPA ĮGYVENDINIMO IR PRIEŽIŪROS INSTITUCIJŲ IŠŠŪKIAI IR SPRENDIMAI

	IŠŠŪKIAI	SIŪLOMI SPRENDIMAI
SPA mechanizmų taikymo fragmentiškumas tarp LT institucijų	• Nežinoma kokiais kanalais pranešti apie turinį • Nenaudojama vidinė skundų sistema • Neteikiami pranešimai SPK apie pateiktus nurodymus pagal SPA 9-10 straipsnius	• Atmintinės apie raportavimo kanalus paruošimas • Kvietimai į renginius, darbo grupes, EK gairių sklaida • Ekosistemos įgalinimas – išlieka prioritetu RRT 2026 metams
Tarpininkavimo paslaugų teikėjų reakcija į institucijų pranešimus	• Skirtingos SPA 11 straipsnio įgyvendinimo priemonės • Pranešimams taikomi apribojimai (pvz., formų limitai, „onboarding“) • Nepaskelbti bendriniai kontaktiniai centrai institucijoms • Platformos nepraneša institucijoms apie gautus pranešimus bei nurodymus, jų veiksmus • Reakcijos laikas neproporcingas ilgas	• VLOPs/VLOSEs ir kitų platformų bendrinių kontaktinių centrų prieigos užtikrinimas LT institucijoms • Bendradarbiavimas su Lietuvos teikėjais dėl kontaktinių centrų paskelbimo • SPK ir EK darbas dėl raportavimo limitų mažinimo ir sistemų tobulinimo

2026 m. SPK PRIORITETINĖS VEIKLOS KRYPTYS



Lietuvos SPA ekosistemos įgalinimas

Lietuvos tarpininkavimo paslaugų teikėjų priežiūra

SPA mechanizmų taikymas ir įgalinimas kovai su finansiniu sukčiavimu

SPA mechanizmų taikymas ir įgalinimas kovai su dezinformacija

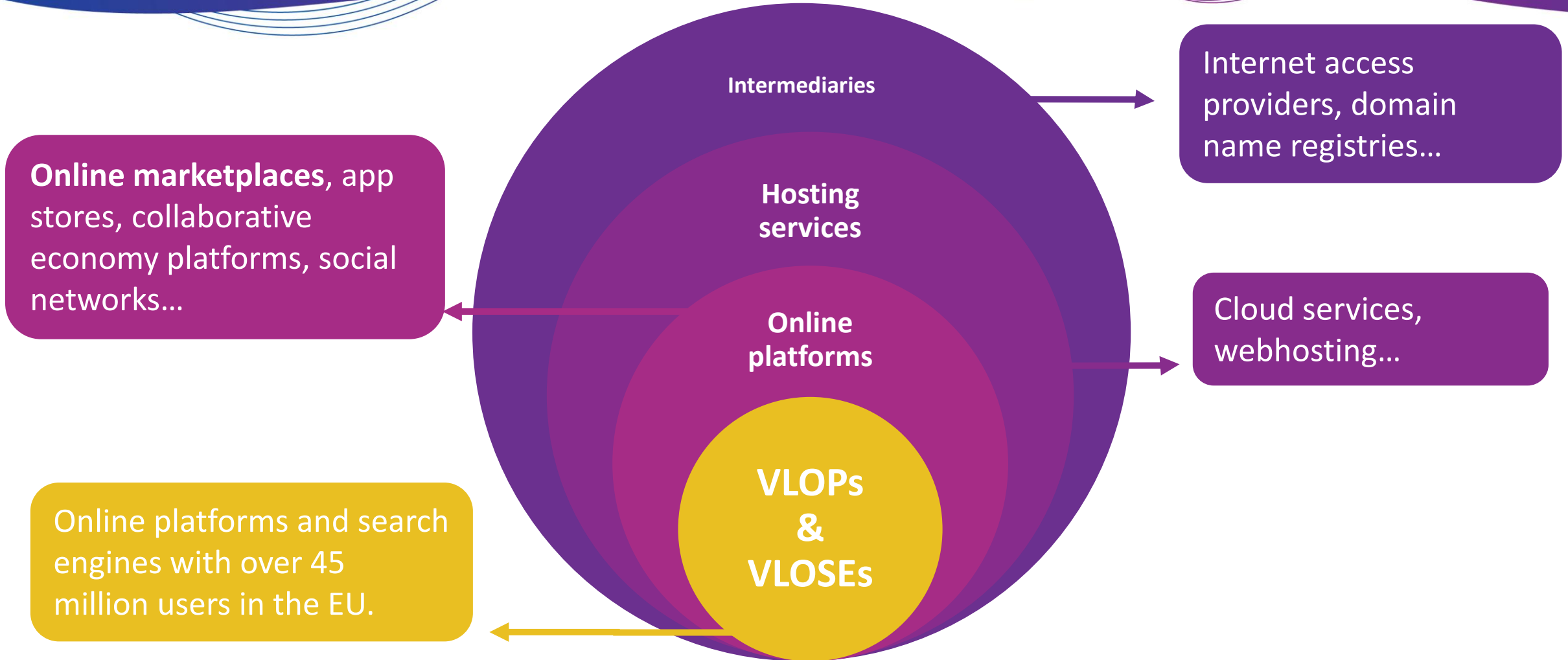
Nepilnamečių apsauga internete



DIGITAL SERVICES ACT

Directorate General for
Communications Networks,
Content and Technology

Who does the DSA apply to?



Governance of supervising digital services



Digital Services Coordinator (National level)

- Independent authorities
- Direct supervision and enforcement of platforms with less than 45 million monthly users in the EU
- Coordination and exchanges with other national competent authorities



European Board for Digital Services

- Ad-hoc independent advisory group
- Composed by national Digital Services Coordinators
- Chaired by the Commission
- Advises DSCs and COM, issues recommendations
- Ensures consistent application of the DSA



European Commission

- Direct enforcement of the rules for very large online platforms and search engines
- Advises on cross border disputes
- Intervenes following DSC requests

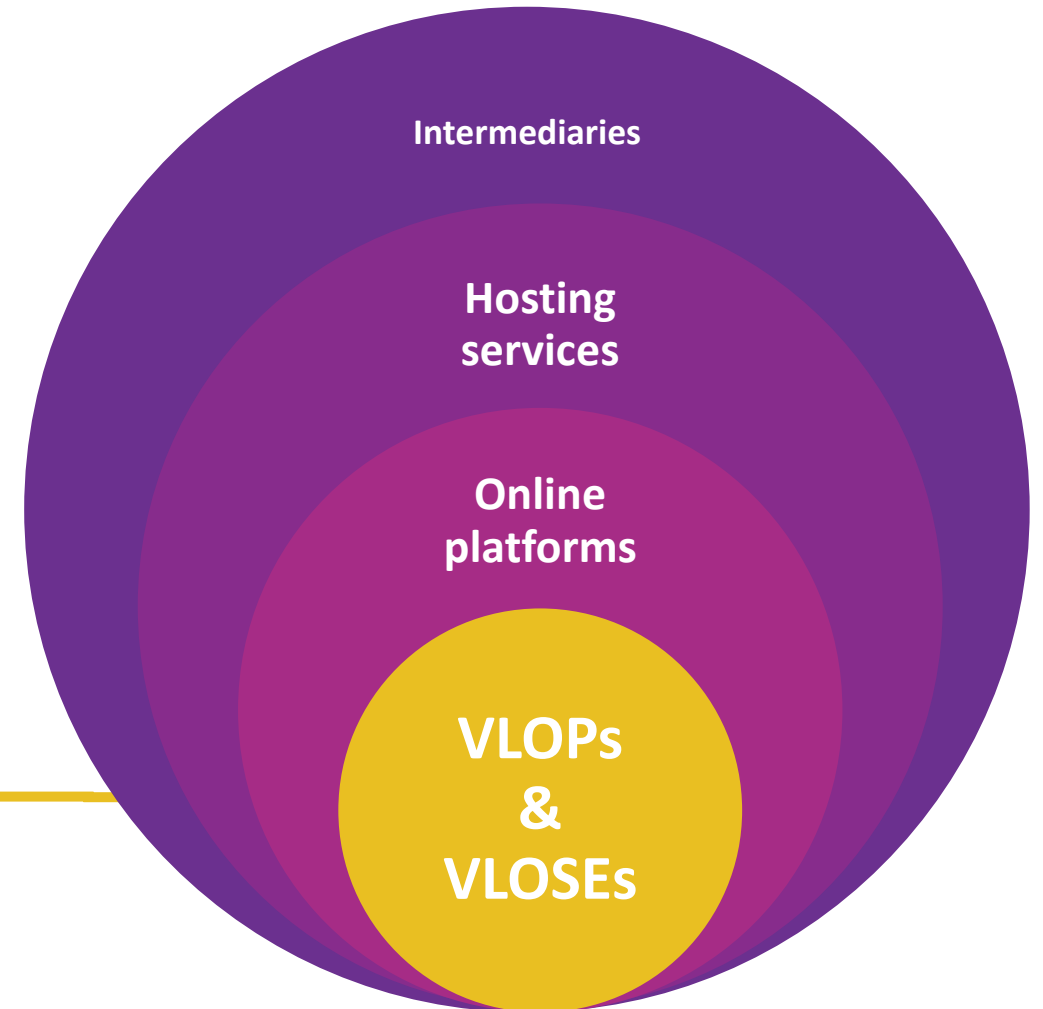


Digital Services Act as a general human rights framework

	VERY LARGE PLATFORMS	ONLINE PLATFORMS	HOSTING SERVICES	ALL INTERMEDIARIES
Transparency reporting	•	•	•	•
T&Cs	•	•	•	•
Cooperation with national authorities	•	•	•	•
Points of contact & legal representatives	•	•	•	•
N&A	•	•	•	
Reporting criminal offences	•	•	•	
Complaint & redress mechanisms, OOC dispute settlement	•	•		
Trusted flaggers	•	•		
Prohibition of Dark Patterns	•	•		
Measures against abusive notices	•	•		
Special obligations for marketplaces (e.g. KYBC, random checks)	•	•		
Bans on targeted ads to children and based on special categories of personal data	•	•		
Accessibility	•	•		
Transparency of recommender systems	•	•		
Advertising transparency	•	•		
Risk management	•			
Independent audits	•			
User can opt out of profiling	•			
Data sharing with authorities & researchers	•			
Codes of conduct	•			
Crisis response cooperation	•			

Regular risk assessment obligations only for VLOPSEs

- ***Identify, analyse and assess systemic risks***
 - Design of recommender systems
 - Content moderation systems
 - Terms & Conditions (enforcement)
 - Ad systems
 - Data related practices
- ***Effective risk mitigation measures***
 - Adapting design, features and functioning of service
 - Adapting (algorithmic) systems and/or internal processes
 - Cooperation with trusted flaggers



Summary of designations

Very Large Online Platforms

- Alibaba AliExpress
- Amazon Store
- Apple AppStore
- Booking.com
- Facebook
- Google Play
- Google Maps
- Google Shopping
- Instagram
- LinkedIn
- Pinterest

- Pornhub
- Shein
- Snapchat
- Stripchat
- Temu
- TikTok
- Twitter / X
- Wikipedia
- YouTube
- XNXX
- Zalando

Very Large Online Search Engines

- Bing
- Google Search

Which risks does the DSA want to tackle?



Dissemination of illegal content



Negative effects on fundamental rights



Negative effects on civil discourse, electoral processes and public safety



Negative effects on minors, public health, mental and physical wellbeing, and gender violence.

Risk mitigation measures examples



Adapting the **design, features or functioning** of their services



Adapting their **terms and conditions** and their enforcement



Adapting **content moderation** processes

1010
1010

Testing and adapting their **algorithmic systems**, including their recommender systems



Adapting their **advertising** systems



Codes of conduct and the crisis protocols



Awareness-raising measures and adapted online interfaces for more user information



Labelling **deepfakes**

Requirements for risk mitigation measures



Reasonable, proportionate and effective



Consideration to the impacts on fundamental rights, especially freedom of expression

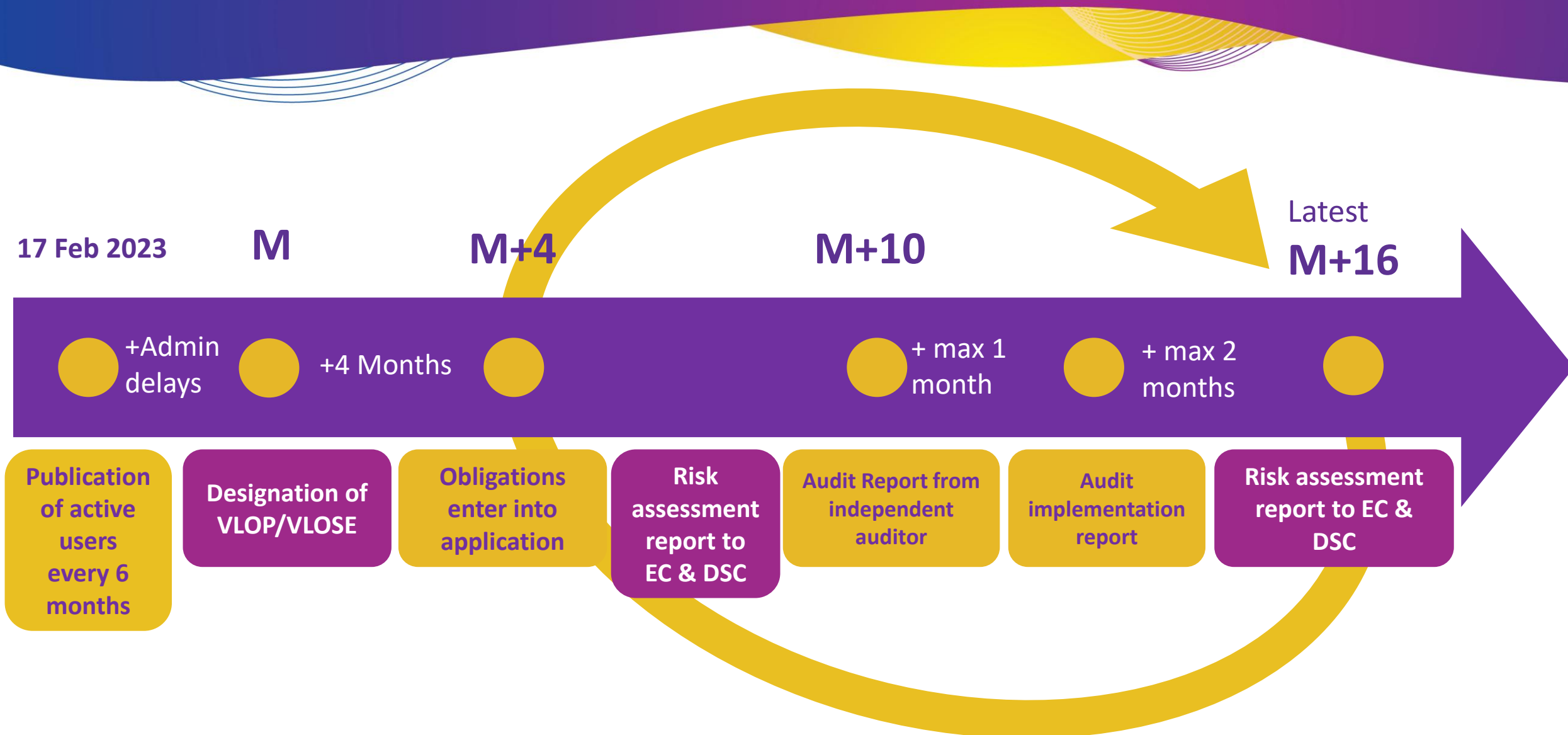


Based on the best available information and scientific insights



Test assumptions with the groups most impacted by the risks and the measures taken

Risk management yearly cycle



Information integrity

The background features a vertical color gradient from dark blue on the left to deep purple on the right. A large, wavy, yellow-orange shape occupies the bottom half of the frame. In the top-left corner, a cluster of small white dots is arranged in a circular pattern. The bottom-left and bottom-right corners also contain fields of small white dots. On the right side, several thin, white, parallel diagonal lines are visible.

Disinformation in the context of EU policies

False or misleading content that is spread with an intention to deceive or secure economic or political gain and which may cause **public harm**

By public harm we mean threats to democratic processes and to the EU's security, environment and citizens' health

EU Commission & Disinformation: the approach

**Fight disinformation and
protect fundamental rights**

Whole-of-society approach



EU Commission & Disinformation: Three Pillars

Digital Services Act



The DSA is a global-first legal standard for tackling disinformation while protecting freedom of expression and information. Its main regulatory tool is the supervised **risk management framework** for larger online platforms.

The Code of Conduct on Disinformation



Self-regulatory framework, implemented by several major online platforms and other relevant stakeholders, containing a long set of commitments and measures to address the phenomenon of online disinformation.

European Digital Media Observatory



Multidisciplinary community composed of fact-checkers, media literacy practitioners, researchers, media organisations and other relevant stakeholders. EDMO and its hubs detect, **analyse and expose disinformation campaigns & build up societal resilience.**

Code of Practice on Disinformation -> Code of Conduct on Disinformation



Self-regulatory framework, implemented by several major online platforms and other relevant stakeholders, to address the phenomenon of online disinformation.



Became the **Code of Conduct under the DSA** (full effect July 2025)



Annual audits assess compliance with code commitments (Article 37(1)(b)).



Compliance officers shall monitor compliance with code commitments (Article 41(3)(f)).



Codes can act as measures to terminate or remedy infringements (Article 75(2) and (3))

The Code of Conduct on Disinformation

44 Commitments & 128 Measures

Demonetisation

- Avoid advertising next to disinformation
- Better cooperation across the ad-industry

Transparent political advertising

- Efficient labelling
- Transparency obligations

Reducing manipulative behaviour

- Current and emerging forms
- Stronger cooperation among signatories

User empowerment

- More and better tools to identify, flag and react to disinformation
- Better access to reliable information
- Enhancing Media Literacy

Fact-checking coverage throughout the EU

- Extending fact-checking coverage
- Consistent use and integration of fact-checkers' work
- Fair financial contributions

Data access for research

- More and easier access to platforms' data
- Support for research



DSA - Election guidelines



Elections are DSA enforcement priority



The Commission can issue guidelines on specific risks with DSCs



Guidelines focus on negative effects on electoral processes



Published on 26/03 (after a public consultation)

Content of election guidelines



Reinforcing internal processes for elections



Risk mitigation measures for electoral processes



Mitigation measures linked to Generative AI



Cooperation with national authorities, independent experts and CSOs



During an electoral period (incl. incident response)



After an electoral period (incl. post-election review)



Specific guidance for the elections to the European Parliament

Incident / Crisis



Scope of the Framework

Incident:

- A fast-evolving situation taking place within or outside the EU;
- with an online dimension and presumed connection to the scope of DSA;
- negatively affecting the recipients of the service in the Union;
- requires an immediate response;

E.g. riots organised or promoted online, large-scale online hate speech or harassment campaigns, coordinated online disinformation campaigns close to an electoral event.



Crisis:

- According to the DSA (Article 36 and Recital 91):
- Extraordinary circumstances;
- can lead to a serious threat to public security or public health;
- in the Union or significant parts thereof;

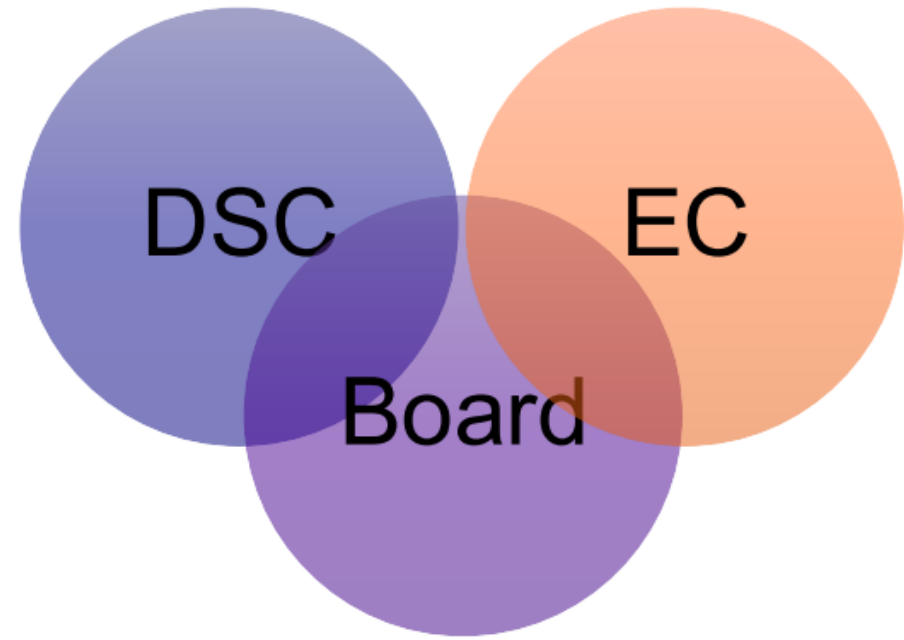
E.g. armed conflicts or acts of terrorism, as well as from pandemics and other serious cross-border threats to public health.

Actors involved

- **Commission and its services ;**
- **Digital Services Coordinators;**
- **European Board for Digital Services;**

But also:

- **VLOPs** and **VLOSEs**;
- Other authorities at Union/national level, including **judicial** and **law enforcement**;
- **Researchers** and **CSOs**, contracted or in voluntary cooperation;
- Third parties that concluded an agreement with the Commission (Art 64,72 DSA);

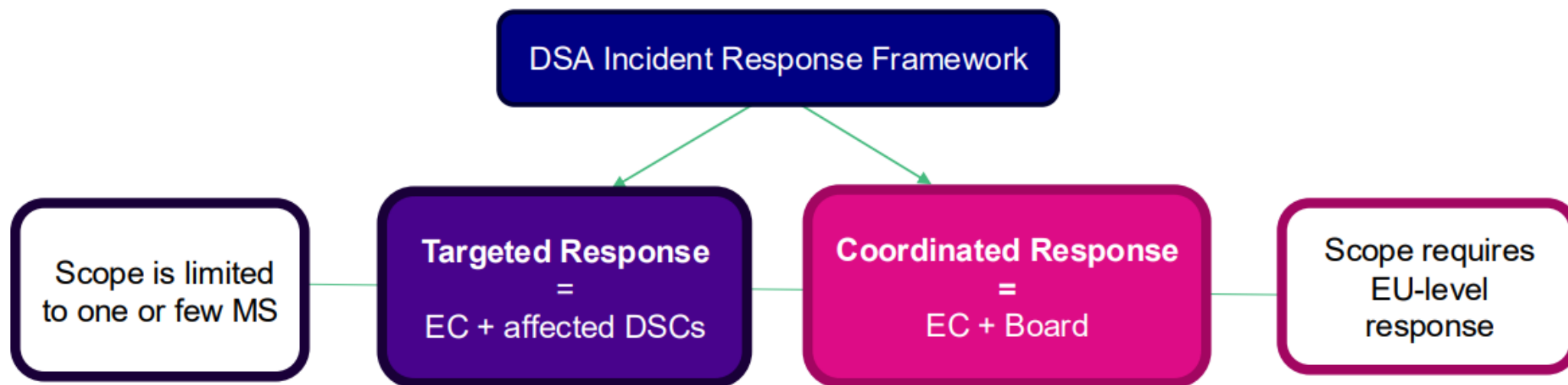


DSCs and VLOPSEs should establish and communicate dedicated contact points

DSA Incident Response Framework

The framework includes **two levels** of response:

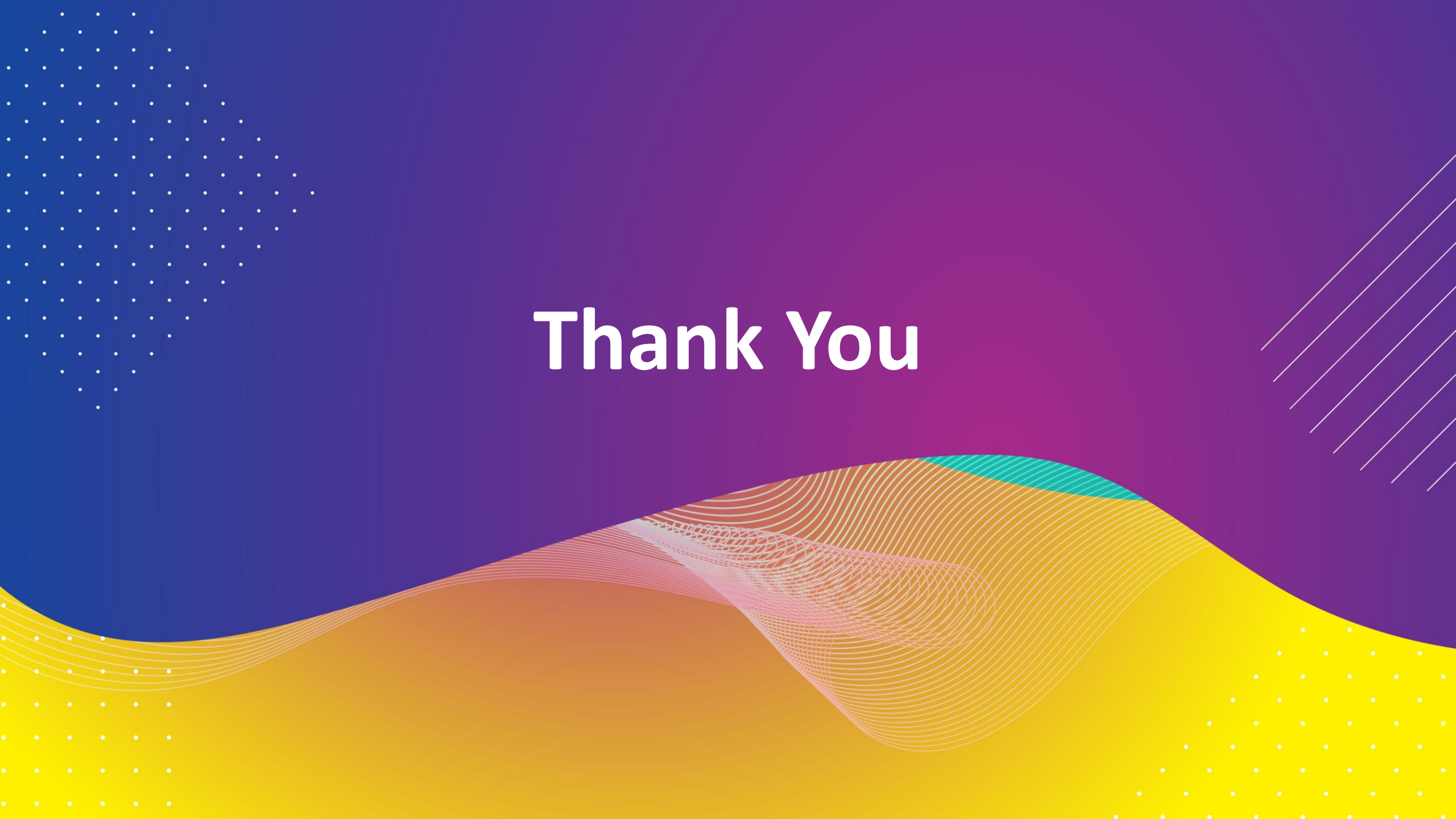
- **Targeted Response**: for incidents negatively affecting users of VLOPs or VLOSEs in one or more Member States. Responses under this level are coordinated by the Commission in collaboration with the affected DSC(s)
- **Coordinated Response**: incidents and crises requiring immediate and coordinated response at EU level. Responses under this level are coordinated by the Commission in collaboration with the Board.



DSA Crisis-specific provisions

Should an incident evolve into a crisis, the Commission and the Board may consider the following tools provided by the DSA:

- 1. Crisis response mechanism under Article 36:** where a crisis occurs, the Commission, acting upon a recommendation of the Board, may adopt a decision, requiring VLOPSEs to:
 - assess whether their services significantly contribute to a crisis, or are likely to do so;
 - identify and apply measures to prevent/eliminate/limit any such contribution to the serious threat;
 - report to the Commission on the assessments, implementation and impact of the specific measures taken;
- 2. Voluntary crisis protocols, including under Article 48:** The Commission may consider encouraging VLOPs and VLOSEs, Member States and others to apply existing voluntary crisis protocols.



Thank You



SKAITMENINIŲ PASLAUGŲ AKTO NURODYMŲ IR SKUNDŲ MECHANIZMAI: PRAKTINIS TAIKYMAS

NURODYMAI 9-10 SPA STRAIPSNIAI

Teisinis pagrindas

- **9 straipsnis:** Įpareigoja tarpininkavimo paslaugų teikėjus imtis veiksmų prieš neteisėtą turinį gavus kompetentingos institucijos nurodymą
- **10 straipsnis:** Įpareigoja paslaugų teikėjus pateikti informaciją apie paslaugos gavėjus pagal kompetentingos institucijos nurodymą

Institucijų veiksmai

- Teikti nurodymus tik dėl neteisėto turinio pagal nacionalinę teisę bei institucijos kompetencijos ribose
- Apie nurodymą ir vykdymą/pranešti - RRT valdomą per 5 d.d. [SPAIRIS](#) sistemą (IVPĮ 21 (2) Str.)

Paslaugų teikėjas privalo:

- Patvirtinti nurodymo gavimą
- Informuoti apie įgyvendinimą
- Nurodyti įgyvendinimo laiką ir poveikį

BENDRINIS KONTAKTINIS CENTRAS INSTITUCIJOMS 11 SPA STRAIPSNIS

Single Point of Contact for EU Member States' authorities, the EU Commission, the EU Board for digital services

Please note: This form is intended to provide a point of contact for Facebook and Messenger, as required under Article 11 of the EU Digital Services Act (DSA), for EU Member States' authorities, the EU Commission and the EU Board. It should not be used for any other purpose.

1. Please identify the nature of your communication

- ☐ Request for disclosure of account records
- ☐ Request for removal of content
- ☐ Other issue (such as request for information about our services or complaints under Article 53)

Send

Designated Point of Contact for Government Authorities

Member States' authorities, the European Commission, and the European Board for Digital Services can contact Twitch through our online [Government Contact Form](#). Please note that this web form is only for communications from official government entities, and we will not respond to communications from others. Please communicate with us in English, as this will be the fastest and most efficient. If necessary, you may also communicate with us in German.

Contact points for regulators

Pursuant to Article 11 of the DSA, the Amazon EU Store's single point of contact email alias to enable direct communication with Member States' authorities, the European Commission, and the European Board for Digital Services for the application of the DSA is amazon-dsa-compliance@amazon.com. While we accept communications in English, German, and French, English is preferred.

DSA Point Of Contact

Google seeks to assist EU Member State Authorities, the European Commission, DSA Trusted Flaggers, Article 86 organisations, and other Professional Entities under a specific relationship with Google, in communicating directly and efficiently with us. Please select from the options listed below, which will enable you to communicate with Google in accordance with the Digital Services Act.

*DSA Point of Contact Language: English

Select your role

- ☐ **Trusted Flagger**
Entities awarded this status by EU Member State Digital Services Coordinators and appearing on the European Commission-published Trusted Flagger list that can report illegal content on Online Platforms with priority.
- ☐ **Member State Authorities, European Commission, & Professional Entities**
Representatives of EU Member State Authorities, the European Commission, Article 86 Organisations, and professional entities who need to submit an order to remove illegal content, request user data, or communicate regarding other issues.

DSA Article 11 Point of Contact for European Commission and Member State Authorities

Microsoft Ireland Operations Limited has designated DigitalServicesAct@microsoft.com as the DSA Article 11 single point of contact for direct communications with the European Commission, Member States' Authorities, and the European Board for Digital Services in connection with the application of the DSA. English is the preferred language for communication with this point of contact.

When sending messages to DigitalServicesAct@microsoft.com, please be sure to include:

- Your full name
- The name of the EU-based authority on whose behalf you are contacting us
- An email address to contact you, which should be associated with the relevant EU-based authority

This point of contact is reserved for engagement with the authorities listed above. For other types of inquiries, please use the mechanisms described below.

SKUNDAI 53 SPA STRAIPSNIS

Teisinis pagrindas

SPA 53 straipsnis suteikia teisę **tarpininkavimo paslaugų gavėjams** arba jų vardu veikiantiems juridiniams asmenims pateikti skundą dėl paslaugų teikėjo veiksmų ar neveikimo, jei įtariamas SPA pažeidimas

Skundo pateikimo procesas

34-38 straipsniai IVPĮ :

- Skundas teikiamas **Skaitmeninių paslaugų koordinatoriui ar kitai kompetentingai institucijai** toje valstybėje narėje, kurioje paslaugos gavėjas yra įsisteigęs arba gyvena
- Jei paslaugas teikėjas įsisteigęs kitoje ES valstybėje, jis yra perduodamas tos šalies SPK
- Kompetentingos institucijos: RRT, ŽEIT, VVTAT, VDAI
- Skundai kitų šalių SPK perduodami per Agoros sistemą

Statistika

2025: Gauti 7 skundai dėl paslaugų teikėjų Lietuvoje, 11 skundų išsiųsta kitų šalių SPK



**SKAITMENINIŲ
PASLAUGŲ
AKTAS:
PATIRTYS,
REZULTATAI IR
ŽVILGSNIS Į
ATEITĮ**



www.rrt.lt

 Ryšių reguliavimo tarnyba

 RRT | The Communications Regulatory
Authority of the Republic of Lithuania