



European  
Partnership for  
Democracy

# EU Regulation on Transparency and Targeting of Political Advertising

## What Impact for CSOs?

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May 2026

A cheatsheet

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## Introduction

The EU's Regulation on **Transparency and Targeting of Political Advertising** (TTPA) came into application on 10 October 2025. Its aim is to promote open and fair political debate and elections by creating transparency around political advertising in the EU. Under the new framework, **advertisements must be clearly labeled as political**, and include information on who is funding them, the amounts spent, and details on how the ad is promoted.

The TTPA's definition of political advertising, however, is very broad and **may also encompass certain activities of civil society organisations** (CSOs) online, such as advocacy campaigns and fundraising, and have a concrete impact on their communication strategies. It is therefore crucial for CSOs to familiarise themselves with the regulation to ensure compliance of their online activities without undue restrictions.

Adding to the complexity, most online platforms that provide political advertising services have decided to **withdraw from the EU market for political ads**, including Google and Meta. To fully assess the regulation's impact on CSOs, it is also necessary to consider these companies' internal policies and initial approaches to implementing the TTPA.

This cheatsheet is a practical guide for CSOs to better understand and navigate the TTPA.

## Everything you always wanted to know about the TTPA (but were afraid to ask)

The TTPA introduces rules to increase transparency around political advertising. To understand those rules, and their impact on CSOs it is important to first understand:

**1. What are political ads?** The Regulation defines political ads in Article 3.2 as:

*“the preparation, placement, promotion, publication, delivery or dissemination, by any means, of a message, normally provided for remuneration or through in-house activities or as part of a political advertising campaign:*

*(a) by, for or on behalf of a political actor, unless it is of a purely private or a purely commercial nature; or*

*(b) which is liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process, at Union, national, regional or local level; [...]*”

**2. What are the main obligations related to political ads?** Article 11 and 12 include labelling and transparency requirements for each political advertisement such as:

- obligations to clearly state that the message is a political advertisement; the identity of the advertisement's sponsor;
- the election, referendum, legislative or regulatory process to which the political advertisement is linked;
- information on criteria used for targeted ads and ad-delivery techniques (Chapter III).

According to Article 13, the ads also have to feed into an online ad repository.

**3. Who has to comply?** There are multiple actors mentioned in the text that will have to comply with the obligations outlined above. This includes:

- **Providers of advertising services** (Article 3.6), defined as anyone (natural or legal person) engaging in the provision of political advertising services; and
- **Publishers** (Article 3.13), defined as a sub-category of providers of political advertising service who disseminate political advertising through any medium. In many cases they overlap with the providers completely, such as for online platforms.

*The [guidelines](#) further specify that this includes copywriters, design agencies, advertising agencies, political consultancies (preparation); broadcasters, newspapers, billboards, bus shelter wraps, interactive displays, digital screens, LED billboards, online platforms, websites (including news sites), forums and blogs, video sharing sites, bloggers, influencers (publication); ad technology providers (e.g. ad networks, ad exchanges, ad platforms), targeting and media consultancies, data brokers (delivery or dissemination).*

**Obligation:** Providers have to request sponsors for the relevant information for the labelling of political ads and publishers have to include the relevant information in the labelling.

- **Sponsors** (Article 3.10) are defined as the natural or legal person at whose request or on whose behalf a political advertisement is prepared, placed, promoted, published, delivered or disseminated.

*In particular, according to the [guidelines](#), it can be: political parties, political alliances, political groups, candidates for elected office,*

*individuals running electoral campaign (e.g. third-registered parties), elected politicians, members of governments, ministries, Civil Society Organisations (e.g. Non-Profit Organisations), think tanks, commercial companies.*

**Obligation:** Sponsors are obliged to transmit the relevant information to the providers and publishers.

- **Controllers** (Article 3.14) are defined by referencing the EU's [General Data Protection Regulation](#) as the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. For our ends, this is often the provider in the shape of an online platform (e.g. ad technology provider) and it's relevant for the obligations in Chapter III on transparency for targeting and amplification.

## **So how are CSOs specifically impacted by the TTPA?**

CSOs can be impacted by the TTPA as sponsors of political ads. In particular in two cases (see full cheatsheet below for more details):

- Their content can be considered political ads when it's paid-for and liable and designed to influence the outcome of an election, referendum or regulatory process, according to the definition of political ads in Article 3.2. For example, an NGO pays an advertising agency to prepare an ad to be published on a billboard.

**Obligation:** In this case the NGO has to provide the information for the labelling of the political ad.

- More often, CSOs would publish their content on online platforms through their own in-house activities. In this case, it would be considered as political advertising only when the CSO paid for its promotion on the platform. This is because the text specifies (Recital 24) that for in-house activities the only obligations applicable are those in Chapter III, Targeting and ad delivery of online political advertising.

*This is also clarified in the political ads [guidelines](#) "In-house activities which do not involve using targeting or ad-delivery techniques would not trigger any obligations under Chapter III of the Regulation" in 2.2.2.*

**Obligations:** In this case they will be subject to Chapter III, Article 19. This is an obligation mostly to the ‘controller’ (the online platform) to provide a way to disclose the information requested on targeting and ad delivery.

## Current political situation

This may give the impression that CSOs face very few obligations, and to a large extent this is true. However, the situation is further complicated by **platforms’ decisions to withdraw political advertising** from the EU market. Decisions by Meta and Google have created a scenario in which compliance must be ensured not only with EU legislation, but effectively with the internal policies of private companies. This represents a significant democratic deficit. Moreover, given platforms’ general reluctance toward political content, this shift risks leading to increased removals and a **substantial narrowing of the space for online political discourse**.

**CSOs are particularly vulnerable in this regard:** their promoted content may be classified as political advertising and removed under platforms’ internal rules. Finally, the shutdown of political advertising repositories poses serious challenges for researchers, who are increasingly unable to monitor and analyse online political campaigns. At present, it remains unclear how platforms will implement their new policies. However, early evidence points to several concerning trends:

- Some CSOs have seen their existing advertising campaigns frozen on Facebook.
- In addition, both the communication and the implementation of these policies are highly inconsistent across different Meta offices within the EU: while some offices have provided detailed guidance and concrete examples of permitted and prohibited content, others have offered no clarification at all.
- CSOs are increasingly required to be extremely precise in how they frame their calls to action, for example, they may be allowed to state “donate to organisation X,” but not “support our work on climate change”; or ‘celebrate women’s rights’ instead of ‘support women’s rights’.
- Many CSOs also report feeling compelled to shift toward commercial advertising models, such as promoting the sale of branded merchandise, which is permitted, while advertising their policy positions is not.
- Some organisations have pointed out that digital advertising is essential to their financial viability; without the ability to fundraise

online, they would face severe operational consequences, including staff layoffs.

- There are also existing [tools](#) to avoid overremoval of political content online such as the ‘Human Writes’ font that makes detection by automated tools more difficult.

## **The Ultimate TTPA Cheatsheet**

While the TTPA itself imposes relatively modest obligations on CSOs, actual compliance ultimately depends on the internal policies of the main online platforms. CSOs are not only required to comply with EU law, but also with the increasingly restrictive and inconsistent policies of private companies, resulting in a significant contraction of the online space for promoted political discourse.

The flowchart illustrates how a CSO’s online content may fall within the scope of EU political advertising rules and, crucially, how platform policies ultimately determine whether that content can be promoted at all.

**START**

Did you pay for sponsored content online?

No

You are **not in scope**

Yes

Is your content a position paper?

No

Is your content for fundraising?

No

Yes

Yes

Does your content aim at influencing a legislative process or an election?

Yes

No

You are **in scope**

Is it on **Google or Meta?**

No

Yes

You are still **subject to TTPA obligations**

The content is **not allowed as sponsored** and **could be removed or restricted** to be commercial

## Three levels of compliance

At the outset, it is important to understand that CSOs effectively face three overlapping levels of compliance:

- Compliance with EU law, in particular the TTPA rules on political advertising (e.g. labelling and transparency requirements).
- Compliance with platform policies, which may go beyond or diverge from EU legal definitions.
- Additional political and risk-based considerations, where platforms adopt restrictive approaches to avoid controversy or regulatory exposure.

## Is the content paid-for?

The first decision point asks whether the CSO is posting paid-for, promoted content, in particular:

- Organic (non-promoted) content: This is not impacted by the TTPA. CSOs can publish political or advocacy content organically without triggering political advertising rules.
- Promoted content (ads): This is where TTPA relevance begins, and where most problems arise.

## What is the nature of the promoted content?

Once content is promoted, the next step is to assess its substance.

- Position papers: These clearly fall under the scope of the TTPA, as they are susceptible to influencing legislative processes or public policy.
- Fundraising ads: These sit in a grey area and are highly contextual:
  - A pure advocacy CSO fundraising for campaigning activities may fall within scope.
  - A service-delivery CSO (e.g. running women's shelters) fundraising for operational services may fall outside scope.
  - Hybrid organisations are particularly difficult to assess, and outcomes may depend on how the ad is framed and who it targets.

- If the promoted content is intended to influence a legislative process, public policy, or elections, it is considered political advertising under the TTPA.

### **If in scope: what does EU law require?**

Where content is deemed to fall within the scope of the TTPA, the legal consequences are relatively limited and have been outlined above. In particular the ad must be labelled as political advertising and platforms should provide technical options to disclose information such as: who paid for the ad; the identity of the sponsor; other transparency information linked to the campaign.

### **Platform policies: where the real barrier arises**

The next step asks whether the ad is promoted on major platforms such as Google or Meta. In theory, platforms should simply facilitate TTPA-compliant political ads. In practice, however, this is where the system breaks down. Most platforms commonly used by CSOs do not allow political ads at all, such as LinkedIn, TikTok, Google and Meta.

As a result platforms do not offer the required political ad transparency tools and ads that are considered political are either rejected upfront or removed after publication. This means CSOs cannot comply with EU law even if they want to, because platforms refuse to carry the ads altogether.

The situation is further complicated by differences in how platforms define political advertising. Google largely refers back to the TTPA definition, Meta, by contrast, applies a broader definition, including so-called *social issue ads*, which do not necessarily have to be linked to elections or a legislative process. As a result, content that may not clearly qualify as political advertising under EU law can still be treated as political under platform rules, triggering bans or removals.

## **Final outcome for CSOs**

The end point of the flowchart highlights the practical consequences. Promoted CSO content that is political in nature is not allowed as sponsored content on major platforms. Ads may be refused at the promotion stage, or removed after publication. CSOs may be pressured to rephrase advocacy messages as commercial advertising, or avoid political promotion altogether.

## **FAQs**

### **My CSO is based outside of Europe. Does the TTPA apply to me?**

Yes. The TTPA applies political advertising disseminated in the UE irrespective of the place of establishment of the sponsor (CSO), according to Article 2.

### **I want to publish my content, who ultimately labels the political ad?**

The publishers (online platform) label the political ad - based on the information provided by the sponsor (CSO). The CSO, however, has to provide the relevant information for the label.

### **Is there a service I can ask for advice if I am unsure if my content falls under TTPA?**

The national authorities appointed to implement and enforce the Regulation - often the telecoms or media authorities / Digital Services Coordinators, but it varies depending on the EU member state. Another important resource is the [European Commission-issued](#) Guidelines to support the implementation of the TTPA. Ultimately, though, it is important to ask the platforms themselves, since internal policies apply in most cases, such as with Google and Meta.

## Annex I: Glossary

**TTPA:** The EU's Regulation on Transparency and Targeting of Political Ads. It introduces transparency obligations to label political ads as political and include information on sponsors. It entered into application in October 2025.

**Political Ads:** paid-for message published by a political actor or susceptible to influence elections or a legislative process. For example: a message on a billboard paid by a political party but also a CSO position paper promoted on an online platform.

**Political Ads services:** the activity of publishing or promoting a political ad in exchange for remuneration. Google and Meta for example used to offer political ads services by giving the option to pay to promote a political message on their platforms.

**Sponsored / paid-for / promoted content:** content that has been paid for to ensure the preparation or publication; or other features such as 'promotion' on online platforms, in particular with amplification and targeting techniques (see).

**Provider:** the actor that engages in the provision of political ads services. For example online platforms.

**Publisher:** the actor that serves as a platform to publish the political ad. Once again, for example online platforms.

**Targeting techniques:** techniques that are used to address a political advertisement only to a specific person or group of persons, or to exclude them, on the basis of the processing of personal data.

**Ad-delivery (or amplification) techniques:** optimisation techniques that are used to increase the circulation, reach or visibility of a political advertisement.

**Labelling (obligations):** Obligation to display specific information with the political ad, in particular on the nature of the ad as political, identity of the sponsor and amounts paid.

**Political ads repository:** An online library for political ads. It should help researchers working on the topic to monitor whole ad campaigns.

**Civil society activities:** Communication activities of CSOs, including the publication of position papers, reactions to political developments, calls to action and fundraising ads.

## **Annex II: Relevant Articles**

### **Recital 24**

Political advertising comprises the situation where the preparation, placement, promotion, publication, delivery or dissemination of a message which is liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process is carried out by an entity acting on its own behalf (in-house activities). In-house activities, which should be considered as solely relevant for Chapter III of this Regulation, should be understood as activities carried out within an entity that comprise or substantially contribute to the preparation, placement, promotion, publication, delivery or dissemination, by any means, of a message which is liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process.

### **Article 3.2: Definition of political ads**

‘political advertising’ means the preparation, placement, promotion, publication, delivery or dissemination, by any means, of a message, normally provided for remuneration or through in-house activities or as part of a political advertising campaign:

- (a) by, for or on behalf of a political actor, unless it is of a purely private or a purely commercial nature; or
- (b) which is liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative

or regulatory process, at Union, national, regional or local level; and does not include:

- (i) messages from official sources of Member States or the Union that are strictly limited to the organisation and modalities for participating in elections or referendums, including the announcement of candidacies or the question put to the referendum, or for promoting participation in elections or referendums;
- (ii) public communication that aims to provide official information to the public by, for or on behalf of any public authority of a Member State or by, for or on behalf of the Union, including by, for or on behalf of members of the government of a Member State, provided that they are not liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process; and
- (iii) presenting candidates in specified public spaces or in the media which is explicitly provided for by law and allocated free of charge, while ensuring equal treatment of candidates;

### **Article 3.6: Definition of providers**

‘provider of political advertising services’ means a natural or legal person engaging in the provision of political advertising services, with the exception of purely ancillary services;

### **Article 3.10: Definition of sponsors**

‘sponsor’ means the natural or legal person at whose request or on whose behalf a political advertisement is prepared, placed, promoted, published, delivered or disseminated;

### **Article 3.13: Definition of publishers**

‘political advertising publisher’ means a provider of political advertising service that publishes, delivers or disseminates political advertising through any medium;

### **Article 3.11: Definition of targeting**

‘targeting techniques’ means techniques that are used to address a political advertisement only to a specific person or group of persons, or to exclude them, on the basis of the processing of personal data;

### **Article 3.12: Definition of ad-delivery**

‘ad-delivery techniques’ means optimisation techniques that are used to increase the circulation, reach or visibility of a political advertisement on the basis of the automated processing of personal data and that can serve to deliver the political advertisement to a specific person or group of persons only;

### **Article 3.14: Definition of controller**

‘controller’ means a ‘controller’ as defined in Article 4, point 7, of Regulation (EU) 2016/679 or, where applicable, as defined in Article 3, point 8, of Regulation (EU) 2018/1725.

## **Article 11: Labelling and transparency requirements for each political advertisement**

1. Political advertising publishers shall ensure that each political advertisement is made available together with the following information in a clear, salient and unambiguous way:
  - (a) a statement that it is a political advertisement;
  - (b) the identity of the sponsor of the political advertisement and, where applicable, the entity ultimately controlling the sponsor;
  - (c) where applicable, the election, referendum, legislative or regulatory process to which the political advertisement is linked;
  - (d) where applicable, a statement to the effect that the political advertisement has been subject to targeting or ad-delivery techniques;
  - (e) a transparency notice containing the information referred to in Article 12(1), or a clear indication of where it can be easily and directly retrieved.

2. Political advertising publishers shall ensure the completeness of information referred to in paragraph 1. Political advertising publishers shall ensure the accuracy of the information on where the transparency notice referred to in paragraph 1, point (e), can be retrieved.
3. The information referred to in paragraph 1 shall be made available in the form of labels adapted to the medium used.

Those labels shall be prominent, shall enable individuals to easily identify a political advertisement as such, and shall remain in place in the event that the political advertisement is further disseminated.

4. By 10 July 2025, the Commission shall adopt implementing acts establishing the format and the template of the labels referred to in paragraph 3. Those implementing acts shall ensure that labels are adapted to the medium used, including for audiovisual and printed media as well as online and offline advertising, taking into account the particular characteristics of that medium, as well as the latest technological and market developments, relevant scientific research and best practices.

Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 29(2).

5. Member States, including competent authorities, and the Commission shall encourage the drawing up of voluntary codes of conduct intended to contribute to the proper application of this Article, taking into account the specific characteristics of the relevant service providers involved and the specific needs of micro, small and medium-sized undertakings qualifying under Article 3(1), (2) and (3) of Directive 2013/34/EU.

## **Article 12: Transparency notices**

1. Political advertising publishers shall ensure that the transparency notice referred to in Article 11(1), point (e), includes the following information:

- (a) the identity of the sponsor and, where applicable, of the entity ultimately controlling the sponsor, including their name, email address, and, where made public, their postal address, and, when the sponsor is not a natural person, the address where it has its place of establishment;
- (b) the information required under point (a) on the natural or legal person that provides remuneration in exchange for the political advertisement if this person is different from the sponsor or the entity ultimately controlling the sponsor;
- (c) the period during which the political advertisement is intended to be published, delivered or disseminated;
- (d) the aggregated amounts and the aggregated value of other benefits received by the providers of political advertising services, including those received by the publisher in part or full exchange for the political advertising services, and, where relevant, of the political advertising campaign;
- (e) information on public or private origin of the amounts and other benefits referred to in point (d) as well as whether they originate from inside or outside the Union;
- (f) the methodology used for the calculation of the amounts and value referred to in point (d);
- (g) where applicable, an indication of elections or referendums and legislative or regulatory processes with which the political advertisement is linked;
- (h) where the political advertisement is linked to specific elections or referendums, links to official information about the modalities for participation in the election or referendum concerned;
- (i) where applicable, links to the European repository for online political advertisements referred to in Article 13;
- (j) information on the mechanisms referred to in Article 15(1);
- (k) where applicable, whether a previous publication of the political advertisement or of an earlier version of it has been suspended or discontinued due to an infringement of this Regulation;
- (l) where applicable, a statement to the effect that the political advertisement has been subject to targeting techniques or ad-delivery techniques on the basis of the use of personal data, including information specified in Article 19(1), points (c) and (e);
- (m) where applicable and technically feasible, the reach of the

political advertisement in terms of the number of views and of engagements with the political advertisement.

2. Political advertising publishers shall ensure that the information referred to in paragraph 1 is complete.

Political advertising publishers shall ensure the accuracy of the information of paragraph 1, points (d), (f), (i), (j) and (m), before and during the period of publication, delivery, or dissemination of the political advertisement.

Where the provider of political advertising services becomes aware that any information transmitted to or published by the political advertising publisher is incomplete or inaccurate, it shall contact, without undue delay, the political advertising publisher concerned and shall transmit completed or corrected information to that political advertising publisher.

Where the political advertising publisher becomes aware by any means that the information referred to in Article 11(1) and paragraph 1 of this Article is incomplete or inaccurate, it shall make best efforts, including by contacting the sponsor or the providers of political advertising services, to complete or correct the information without undue delay.

Where the information cannot be completed or corrected without undue delay, the political advertising publisher shall not make the political advertisement available or shall without undue delay discontinue the publication, delivery or dissemination of the political advertisement.

The political advertising publisher shall without undue delay inform the sponsors or the providers of political advertising services concerned about any decisions under the fifth subparagraph of this paragraph.

3. Transparency notices shall be included in each political advertisement or be easily retrievable at all times during the period of publication of the political advertisement.

Transparency notices shall be kept up-to-date during the entire period of publication of the political advertisement, presented in

a format which is easily accessible and, at least when the political advertisement is made available electronically, available in a machine-readable format. They shall be written in the language of the political advertisement. Political advertising publishers who offer services in the Union shall ensure that transparency notices comply with applicable accessibility requirements, including, when technically feasible, by making the information available via more than one sensory channel.

Transparency notices shall be clearly visible and user friendly, including through the use of plain language.

4. Political advertising publishers shall retain their transparency notices together with any modifications thereto for a period of seven years after the last publication of the political advertisement concerned.

5. Paragraph 4 of this Article shall not apply to micro-undertakings qualifying under Article 3(1) of Directive 2013/34/EU, provided that the provision of advertising services is purely marginal and ancillary to their main activities.

6. The Commission is empowered to adopt delegated acts in accordance with Article 28 to amend this Regulation by adding points to the list of points in paragraph 1 of this Article and by modifying paragraph 1, point (f), of this Article in the light of technological developments, market practices, relevant scientific research, developments in supervision by competent authorities and relevant guidance issued by competent bodies, provided that such an amendment is necessary for the wider context of the political advertisement and its aims to be understood.

7. By 10 July 2025, the Commission shall adopt implementing acts to establish the format of and provide technical specifications for the transparency notice to ensure that it is adapted to the medium used, including for audiovisual and printed media as well as online and offline advertising, taking into account the latest technological and market developments, relevant scientific research and best practices and the specific needs of micro, small and medium-sized undertakings qualifying under Article 3 (1), (2) and (3) of Directive 2013/34/EU.

Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 29(2).

### **Article 13: European repository for online political advertisements**

1. The Commission shall establish and ensure, directly or by entrusting this responsibility to a management authority, the management of a European repository for online political advertisements (the 'European repository') which is a public repository for all online political advertisements published in the Union or directed to Union citizens or residents in the Union. That repository shall include:

- (a) a functionality enabling public access to online political advertisements, together with the information provided by political advertising publishers referred to in Article 12(1) in respect of each online political advertisement from the moment of its first publication; the information shall be available in machine-readable format, shall allow for multicriteria queries and shall be publicly accessible via a single portal;
- (b) a hosting service that ensures the availability of online political advertising and the information published with it referred to in Article 12(1), for the entire period during which the political advertisement is presented and for seven years after the political advertisement was last presented; that hosting service, and access to the information hosted, shall respect and be without prejudice to any legal requirement for the removal of the political advertisement and of the information published with it; that hosting service shall be free of charge for the political advertising publishers that submit an online political advertisement to the European repository.

2. Political advertising publishers that are very large online platforms and very large online search engines shall ensure that each political advertisement, together with the information referred to in Article 12(1) of this Regulation, is made available in a repository, as referred to in Article 39 of Regulation (EU) 2022/2065. In addition, those political advertising publishers shall enable access to that information through the European repository from the moment of publication and for the entire period during which they present

the political advertisement and for seven years after the political advertisement was last presented on their online interfaces.

3. Where political advertising publishers remove or disable access to a specific political advertisement on the basis of an alleged illegality or of an incompatibility with their terms and conditions, they shall continue to provide access to the information required by Article 12(1) of this Regulation for the period referred to in Article 9(3) of this Regulation. This requirement is without prejudice to the requirements laid down in Article 9(2), point (a)(i), Article 17(3), points (a) to (e), and Article 39(3) of Regulation (EU) 2022/2065.

4. Political advertising publishers other than those referred to in paragraph 2 of this Article that publish political advertisements through an online service shall make each such political advertisement and the information required under Article 12(1) available in the European repository no later than 72 hours after the first publication of the political advertisement.

5. The Commission, or, as the case may be, the management authority referred to in paragraph 1, shall have no liability for the completeness and accuracy of the political advertising and the information published with it or its compliance with relevant Union or national law, and other applicable binding rules.

6. By 10 April 2026, the Commission shall adopt implementing acts in accordance with Article 29 to set out detailed arrangements for the provision of a common data structure, standardised metadata to facilitate the inclusion of political advertisements in the European repository and the indexation of political advertising by online search engines, standardised authentication, and a common application programming interface, with a view to enabling the aggregation of the information published online pursuant to this Regulation to be accessed through a single portal.

When adopting those implementing acts, the Commission shall take into account technological, market, and scientific developments, and shall aim to achieve the following objectives:

- (a) to enable the information referred to in paragraphs 1, 2 and 3 to be publicly accessed via the European repository;
- (b) to allow easy public access to online transparency notices

through the use of a common application programming interface that would enable the notices to be accessed and the relevant databases to be queried;

- (c) to support third-party and public access to transparency notices, including by enabling analysis of online transparency notices and their presentation through a user-friendly single portal and search services.

### **Article 19: Additional transparency requirements related to targeting techniques and ad-delivery techniques in the context of online political advertising**

1. When using targeting techniques or ad-delivery techniques in the context of online political advertising involving the processing of personal data, controllers shall, in addition to other requirements laid down in this Regulation and to the requirements laid down in Regulations (EU) 2016/679 and (EU) 2018/1725, comply with the following requirements:

- (a) adopt, implement and make publicly available an internal policy describing clearly and in plain language how such techniques are used, and retain such policy for a period of seven years from the last use of those techniques;
- (b) keep records on the use of such techniques, the relevant mechanisms and parameters used;
- (c) provide, together with the indication that it is a political advertisement, additional information necessary to allow the individual concerned to understand the logic involved and the main parameters of the techniques used, including whether an artificial intelligence system has been used to target or deliver the political advertisement and any additional analytical techniques, and including the following elements:
  - (i) the specific groups of recipients targeted, including the parameters used to determine the recipients to whom the advertising is disseminated;
  - (ii) the categories of personal data used for the targeting techniques or ad-delivery techniques;
  - (iii) the targeting goals, mechanisms and logic including the inclusion and exclusion parameters, and the reasons for choosing those parameters;
  - (iv) meaningful information on the use of artificial

intelligence systems in the targeting or ad delivery of the political advertising;

(v) the period of dissemination of the political advertisement and the number of individuals to whom the political advertisement is disseminated;

(vi) a link to or a clear indication of where the policy referred to in point (a) can be easily retrieved;

(d) prepare an internal annual risk assessment of the use of targeting techniques or ad-delivery techniques on the fundamental rights and freedoms, the results of which are to be made publicly available;

(e) provide, together with the political advertisement unless it is included in the transparency notice required under Article 12(1) of this Regulation, a reference to effective means to support individuals exercise their rights under Regulations (EU) 2016/679 or (EU) 2018/1725, as applicable, in particular, a reference to individuals' rights to amend personal data or withdraw consent as applicable, which is to include a link to an interface allowing for the exercise of such rights.

2. Where the controller is different from the political advertising publisher, the controller shall ensure that the information referred to in paragraph 1, points (c) and (e), is communicated to the political advertising publisher to enable the political advertising publisher to comply with its obligations under this Regulation. The information shall be transmitted in a timely and accurate manner, in accordance with best practice and industry standards by means of a standardised automated process, where that is technically possible.

3. Providers of political advertising services shall, as necessary, transmit to the controllers the information necessary to comply with paragraphs 1 and 2.

4. Information to be provided in accordance with paragraph 1, points (c) and (e), and paragraphs 2 and 3 shall be presented in a format that is easily accessible and, where technically feasible, that is also machine-readable, clearly visible and user-friendly, including through the use of plain language.

5. The Commission is empowered to adopt delegated acts in accordance with Article 28 to amend this Regulation by adding

points to the list of points in paragraph 1 of this Article in the light of technological developments, market practices, relevant scientific research, and developments in supervision by competent authorities and relevant guidance issued by competent bodies.

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