EDRi

**For an inclusive
and equitable
digital environment**

Foreword

2022 was a year of geopolitical awakening for Europe - with growing injustice and deeper social, economic, and climate crises. EDRi's role as the European digital rights watchdog was all the more important in this context. EDRi and its members remain focused on their mission: challenging the abuse of power in the digital age.

EDRi mobilised people and contributed to advocating for robust legislation. The Digital Services Act and the Digital Markets Act are inroads against surveillance-based advertising and the control of Big Tech over information, expression and democracy. Thanks to the hard work of the civil society coalition on the Artificial Intelligence (AI) Act led by EDRi, European legislators have paid more attention to the need for limits to the most harmful uses of AI.

EDRi members have also mobilised against threats to the confidentiality of online communications. EDRi has been at the forefront of voices denouncing the expansion of law enforcement powers with inherent risks of mass surveillance, racial profiling and multiple harms against people on the move. EDRi members led ground-breaking collective complaints and litigation that have contributed to strong wins for data protection.

In 2022, EDRi and its partners also took time for reflective and transformative work. We reflected on the impact of the EDRi network multi-annual strategy at the mid-point, held community-building moments and events, and continued to co-lead the collective design of a decolonising programme for the digital rights field.

We hope you enjoy reading this report on the achievements of the many people who work with EDRi. Thank you for your continuous support.

Claire Fernandez, Executive Director and Anna Fielder, President

OUR MOVEMENT

A growing network of digital rights defenders

**In the General Assembly 2022, EDRi welcomed three new Affiliates to the network.
Mnemonic from Germany, the Irish Council for Civil Liberties (ICCL) from Ireland and Digital Republic from Bulgaria. This status is the first step towards becoming fully-fledged members.**

We also welcomed two new members who were previously Affiliates: Dataskydd.net from Sweden and Citizen D from Slovenia.

In 2022, the EDRi network **expanded to 47 member organisations** active across Europe and beyond, working together to push for robust and enforced laws, inform and mobilise people, promote a healthy and accountable technology market and build a movement of organisations and individuals.

EDRi member SHARE Foundation organised the first Digital Rights Summer School in Perast, Montenegro, laying the foundations for the new Southeast Europe Digital Rights Network (SEE DRN).

"EDRi network is so wide that they can tell us more about the situation in different areas in Europe - it means they give us the facts and examples from across Europe and this makes them more effective in EU advocacy."

- Filomena Chirico, European Commission (DG Connect)

Map represents membership as of 2022:

International:

EFF   PI   epic.org   ARTICLE 19

European:

accessnow   fsfe   noyb

Countries with:

EDRi presence

No EDRi presence

EDRi's Board

In 2022 Alyna Smith, the Deputy Director of the Platform for International Cooperation on Undocumented Migrants (PICUM), was elected as a Board member.

In the General Assembly, **Thomas Lohninger**, EDRi's Vice President, was re-elected as a Board member.

They joined other board members, Anna Fielder, Walter Van Holst and Martha Dark.

EDRi's Brussels staff
(as of May 2023)

Image from EDRi's General Assembly 2022.

Claire Fernandez - *Executive Director*

Diego Naranjo - *Head of Policy*

Sarah Chander - *Senior Policy Advisor*

Jan Penfrat – *Senior Policy Advisor*

Chloé Berthélémy – *Senior Policy Advisor*

Sebastián Becker Castellaro - *Policy Advisor*

Ella Jakubowska – *Senior Policy Advisor*

Guillermo Peris – *Senior Network and Events Manager*

Enxhi Noni – *Events Support*

Ioana Barbulescu - *Senior Membership and Community Officer*

Andreea Belu – *Head of Campaigns and Communications*

Viktoria Tomova – *Communications and Campaigns Officer*

Valentina Carrasco - *Design and Creative Production Officer*

Chiara Miraglia – *Junior Communications and Campaigns Officer*

Shubham Kaushik - *Communications and Campaigns Officer*

Katarína Bartovičová – *Senior Fundraising Manager*

Jean Duclos – *Senior Finance and Administration Officer*

Assita Kone - *Junior Administration and Finance Officer*

A special thanks to former EDRi team members, **Gail Rego, Fenya Fischler, Luisa Balaban,** and **Maria Belén Luna Sanz**.

In 2022 and the first half of 2023, EDRi welcomed **Chiara Miraglia** as Communications and Campaigns Intern, **Enxhi Noni** as Events Support, **Shubham Kaushik** as Communications and Campaigns Officer, **Assita Kone** as Junior Administration and Finance Officer and **Ioana Barbulescu** as Senior Membership and Community Officer.

Organisational development

In 2022 EDRi supported the network through, among others:

▼ Direct financial support
e.g. Panoptykon Foundation on enforcement work for the Digital Services Act and Digital Markets Act enforcement work, ApTI on platform regulation and Bits of Freedom on AI related work.

▼ Information and knowledge-sharing
Gathering information about other European contexts (e.g., internet blocking), organising community-building activities (events, joined projects).

▼ Amplification of members' work
e.g. Privacy International's encryption guide, broadcasting IuRe movie "Digital Dissidents" at Freedom not Fear conference.

▼ Collective work on key legislative files and campaigns
e.g. AI Act amendments, General Data Protection Regulation enforcement and Child Sexual Abuse Regulation.

▼ Greece
The EDRi member in Greece, Homo Digitalis, shared that the support of the network was key for the development of their organisation.

This was notably thanks to EDRi's financial backing in the past two years and the support of other organisations in the network.

Homo Digitalis strengthened their position in the field and were able to lead more programmatic work in coalition. This also resulted in securing funding from the European Artificial Intelligence and Society Fund (EAISF).

They will now be able to hire a full-time Director on AI-related matters for two years, set up the necessary framework for the transition to a full-time organisation and strategise towards sustainable future growth.

▼ Switzerland
The EDRi member in Switzerland Digitale Gesellschaft has also increased their staff size by hiring two part-time employees.

One will cover the communication and campaigning, and the other person will be in charge of fundraising to secure a stable financial situation in the foreseeable future.

▼ EDRi members' challenges in 2022
The lack of capacity and difficulties to recruit was mentioned as one of their main struggles in 2022.

Strategic planning, network health and governance

▾ **EDRi strategy mid-term evaluation**
At the mid-point of EDRi's 2020-2024 multi-annual strategy, EDRi commissioned Organisation Development Support (ODS) to conduct an external evaluation of the strategy.

The evaluation builds on internal learning and evaluation findings and interviews with EDRi members and externals.

At the EDRi General Assembly (GA) in May 2022, members also held a strategic workshop to reflect on EDRi's role in a changing digital rights ecosystem.

The result of the reflections at the mid-point was published in November 2022.

In December, EDRi's Brussels office incorporated the findings into its 2023 Policy, Campaigns and Communications workplans.

▾ **Complaints Committee**
EDRi "populated" its complaint mechanism with two Confidential Advisors and three members of the Complaints Committee.

▾ **20th anniversary research**
In November 2021, EDRi commissioned the Rights Evaluation Studio (RES) to conduct a retrospective research project to mark the network's 20th anniversary, celebrated in 2023.

Following consultations with a range of EDRi stakeholders – including past and present board members, staff, and members – RES lay the ground work for the body of research reports on EDRi's majors outcomes and impacts, with "learning questions on various aspect of EDRi' collective work: mobilisation, network development, and the network identity in a changing field."

EDRi 20

IMPACT JOURNEY

Major outcomes and impacts in 20 years of digital rights advocacy

www.edri.org

Decolonising the digital rights field process

EDRi continued to address the power structures within the European digital rights space through the decolonising process.

Along with Digital Freedom Fund and 30 participants from the digital rights field and social, economic and racial justice groups, we focused our efforts on understanding structures impacting field composition, how resources are allocated, how agendas are set, and crucially, why the people most directly impacted by data-driven harms are excluded from the space.

In 2022, there were two plenary meetings of the process core participants in the process, in Italy and Morocco.

Sessions taking place in Italy (top) and Morocco (bottom).

OUR IMPACT

02.1

PRIVACY AND
DATA PROTECTION

◥ Privacy and data protection are vital for our lives and connections with others. They allow us to work, socialise, organise, express ourselves, care for each other safely, develop our opinions, beliefs and ideas with dignity.

Governments and private companies' attempts to access personal data have severe consequences on people's autonomy and freedoms, especially for human rights defenders and activists.

EDRi works to ensure the enforcement of data protection and privacy standards safeguards against unlawful surveillance practices.

Confidentiality of communications

In 2022, EDRi worked on topics surrounding the unprecedented attacks on our devices and communications by states and companies: Pegasus spyware, client-side scanning, encryption backdoors and broader cybersecurity issues

Encryption position paper

In the context of recent CatalanGate and Pegasus scandals, EDRi's new report offered a review of each state encryption-hacking method and its singular impact on fundamental rights. It was mentioned as a source of information in the European Parliament's PEGA Committee (Spyware inquiry Committee) Draft Report.

Spyware and the PEGA Committee

EDRi members and observers (Access Now, Ross Anderson, Ot van Daalen and Jesper Lund) spoke at hearings of the Committee.

EDRi joined a group of civil society organisations and human rights defenders in urging the European Parliament's Committee of Inquiry to investigate the use of Pegasus and equivalent surveillance spyware.

In 2022, EDRi was invited to a hearing on "spyware and ePrivacy", and was represented by Jesper Lund from EDRi member IT-Pol. Lund explained how the ePrivacy Directive should protect people's devices against interference.

Committee of Inquiry

www.youtube.com

OUR IMPACT > Privacy and Data Protection > Confidentiality of communications
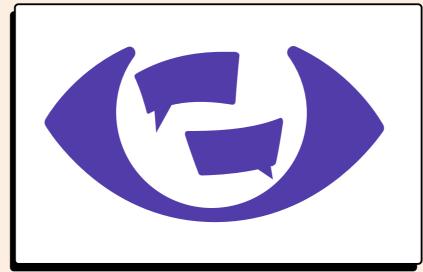
CSA Regulation

EDRi started the "Stop Scanning Me" EU-wide campaign in response to the new and dangerous Child Sexual Abuse material Regulation draft law threatening encryption.

In 2022, European lawmakers proposed new rules with the intent to protect children against the dissemination of Child Sexual Abuse Material Online (the law is known by the CSAR acronym). However, this proposed law would allow authorities to have anyone's legitimate conversations monitored.

The draft law suggests using AI tools and client–side scanning to detect illegal activity, but AI detection inevitably flags a lot of innocent material. In the past, the police unlawfully retained files on innocent people who it has already cleared of suspicions

stopscanningme.eu

around producing or sharing child sex abuse material.

The EDRi network brought together the Stop Scanning Me movement to challenge the European Commission's sweeping surveillance measures and instead suggest alternative, structural approaches to tackle the root of the horrific crime of child sexual abuse.

EDRi released 10 principles for derogating from the ePrivacy Directive for the purpose of detecting CSAM.

◤ Informed EU lawmakers
The principles were used to inform EU lawmakers about the need for an adequate assessment of the necessity and proportionality of any proposed measure to tackle online CSAM.

◤ Reacted to the proposal
Many EDRi members were able to jointly react to the proposal with a quick response after the publication of the draft law.

◤ Called for law withdrawal
After the draft law was published in May 2022, EDRi coordinated an open letter, calling to withdraw the law.

◤ Published an analysis
The press release reacting to the CSAR draft was one of the most successful articles on the EDRi website in 2022.

OUR IMPACT > Privacy and Data Protection > Confidentiality of communication

Work by members

◤ Germany

Organisation: Digitalcourage

Action: Mobilised to ensure immediate and strong rejection by civil society, key politicians and the general public and strong rejection against the CSAR proposal.

Result: Numerous civil society organisations came out against the proposal and committed to working on this issue.

◤ Netherlands

Organisation: Bits of Freedom

Action: Raised public attention on the pitfalls of the Regulation draft.

Result: The Dutch Parliament passed a motion on the protection of end-to-end encryption.

◤ Norway

Organisation: Electronic Frontier Norway

Action: Building against the CSAR nationally could be one of the most significant developments in Norwegian digital rights since the Data Retention Directive.

◤ Austria

Organisation: epicenter.works

Action: Achieved a big win influencing the Austrian Parliament to adopt a binding resolution against the CSAR.

◤ Serbia

Organisations: SHARE Foundation

Action: Created a Digital Security Toolkit an open platform for people to improve their digital security.

Result: Offered help with digital queries and dilemmas.

◤ Romania

Organisations: ApTI

Action: Collaborative advocacy with NGO coalition around the transposition of the European Electronic Communications Code and around a cybersecurity law creating cybersecurity obligations for almost all private entities (including NGOs and media).

Result: More and stricter obligations for legal interceptions and attributions of intelligence services, including cybersecurity obligations.

State surveillance

Our network worked to counter invasive state surveillance practices and domestic intelligence services both through advocacy on laws such as those around the Eurodac database and the expanding powers of Europol, but also through national constitutional complaints.

Eurodac
Eurodac is the EU database used to store asylum seekers' and refugees' data, as well as certain categories of "irregular" migrants.

Via a freedom of access request, EDRi obtained replies from the European Data Protection Supervisor's (EDPS) to the data protection-related questions sent by Members of the European Parliament.

The EDPS' response confirmed that the proposed reform fails to provide evidence for its proposals and would generally increase the degree of arbitrariness and surveillance during migration management procedures.

Prüm II
In December 2021, the European Commission published the legislation "Prüm II". This aimed to ease the collection and sharing of sensitive personal data amongst national police forces and Europol, including by incentivising the establishment of police facial recognition databases.

EDRi member Statewatch worked with other EDRi members and office staff to develop a detailed critique of the proposals.

They argued the proposal was unnecessary and disproportionate – in particular the plan to gather and exchange facial images.

With the help of the EDRi Office, MEPs were directly engaged in this file accompanied by EDRi's well-rounded expertise.

EDRi published one of the few civil society position papers on the Prüm framework ringing the alarm over state over-reach and mass surveillance.

EDRi, Bits of Freedom, Controle Alt Delete and Digital Freedom Fund organised a European Colour of Surveillance Conference.

The conference explored the intersections between racism and surveillance. It aimed at making new connections between racial justice and digital rights groups to join efforts in resisting racism and surveillance.

"The ways the conference not only included but put the lived experiences of affected people and communities at the forefront was essential. This approach is something that other conferences could benefit from."

- Conference participants.

OUR IMPACT > Privacy and Data Protection > State Surveillance

Europol

EDRi and 22 NGOs underlined EU policymakers to radically change Europol reform plans.

The new Europol Regulation, which came into force at the end of June 2022, massively expands the tasks and powers of the EU's policing agency whilst reducing external scrutiny of its data processing operations and rights protections for individuals.

Unfortunately, the approved Europol reform legitimised a data-driven policing model that fails to protect our most basic rights.

The European Parliament agreed to give more power to an institution that already has the upper hand over people. EDRi gathered 15 organisations (EDRi members, journalists, lawyers, researchers, and other NGOs) for a two-day workshop on advocacy for the future of Europol.

This consolidated our coalition work which led to raising awareness on the expansion of Europol powers.

> **It's exhausting to go back and forth to different government agencies to find out what data is stored about me. What do they want to hide? On paper, government agencies should be transparent, but in reality, it's almost impossible to find out what data is stored.**
>
> **- Frank van der Linde,**
> Activist.

EDRi's recommendations included:

▼ Renounce giving Europol more operational powers by way of receiving and analysing data that its current rules forbid it to process;

▼ Reinforce data protection safeguards, notably by increasing the involvement of the EDPS before any new data processing operation;

▼ Abandon any attempt to cancel the effects of the EDPS' Decision;

▼ Guarantee genuine independence of Europol's oversight bodies in charge of monitoring the agency's respect of fundamental rights

OUR IMPACT > Privacy and Data Protection > State Surveillance

Work by members

◥ Germany

Organisation: Gesellschaft für Freiheitsrechte (GFF)
Action: EDRi member Gesellschaft für Freiheitsrechte (GFF) succesfully got a landmark ruling against the Bavarian Constitutional Protection Act BayVSG surveillance and in favour of human rights.

Under BayVSG, Bavarian domestic intelligence services had been granted extended surveillance powers.
The Federal Constitutional Court upheld GFF's constitutional complaint, which was directed against inter alia the collection of telecommunications data, large-scale electronic surveillance of private homes and online searches.

These and other powers interfered with human dignity, the right to informational self-determination, the fundamental right to guarantee the integrity and secrecy of telecommunications and the inviolability of the home.

◥ International

Organisation: Gesellschaft für Freiheitsrechte (GFF) and Reporters Without Borders (EDRi Observer)
Action: The organisations filed a constitutional complaint in Germany to guarantee the protection of journalists' communication.

The revised BND Act fails to take into account the need for the communications of journalists to receive special protection.

Additionally, the law offers different degrees of protection from surveillance depending on an individual's nationality and place of residence, with non-EU citizens being the persons least protected.

For instance, the BND is allowed to monitor non-EU citizens residing abroad insofar as this is deemed necessary for the provision of political information to the Federal Government.

A ruling in the complainants' favour could send a strong signal for stricter regulation of foreign intelligence laws not only in Germany but also in other European countries.

Data retention and state access to data

EDRi has focused in 2022 on legal research, litigation and coordinating coalitions of like-minded voices against the blanket retention of telecommunications data that can reveal vast, personal, sensitive, information about people (data retention), as well as advocating around state access to cross-border data.

EDRi coalition letter signed by lawyers, journalists, NGOs and ISPs, rang the alarm against e-Evidence package over inadequate safeguards.

In 2022, together with a coalition of 15 organisations and companies representing lawyers, journalists, NGOs and Internet Service Providers (ISPs), EDRi urged the European Parliament to maintain its

original approach on eEvidence and not to cede to pressure from the Council.
We called on the Council to give genuine and honest consideration to the European Parliament Rapporteur's package and to show a greater spirit of cooperation and compromise.

Shortly before the end of their mandate, the French Presidency of the Council nearly reached a political compromise with the European Parliament on the "e-Evidence" proposal.

We warned against the foreseen framework that could seriously endanger freedom of expression, privacy rights and the right to a fair trial.

In November 2022, the European Parliament and the Council agreed on the e-Evidence package, weakening the notification mechanism, which involves a 2nd authority to verify the legality of foreign e-Evidence orders.

The compatibility of the Second Additional Protocol of the Council of Europe Cybercrime Convention with EU law is unclear.

OUR IMPACT > Privacy and Data Protection > Data retention and state access to data

Civil society raised concerns during the process and proposed modifications and improvements to the text to avoid these risks. However, those modifications and improvements were not incorporated into the final text. As Member States of the EU will be considering adherence to this Protocol, it is important to ensure that this text is in line with EU law prior to ratification.

In this context, EDRi published its paper on the ratification by EU Member States of the Second Additional Protocol of the Council of Europe Cybercrime Convention.

More than 100 people gathered in Brussels for Freedom Not Fear (FNF), organised by EDRi member Digitalcourage.

The event focused on data retention, chat control, platform power as well as the Digital Markets Act and Digital Services Act, and public and private surveillance technology.

FnF banner in front of EP after the official visit

FnF 2022 group photo

Work by members

◥ Netherlands

Organisation: Bits of Freedom

Action: Filed a complaint against the unlawful data retention concerning millions of people by the Dutch secret services.

Result: They won, thereby for the first time ever triggering the binding capabilities of part of the oversight committee to order the deletion of the data.

◥ United Kingdom

Organisation: Privacy International

Action: Intervened in the case of R (HM and MA and KH) vs. Secretary of State for the Home Department, and made a written submission, supported by witness evidence, demonstrating the considerable privacy intrusion caused by extracting data from someone's mobile phone.

Result: The court found a violation of migrants and might provide Article 8 ECHR rights and a breach of data protection laws. The case set better standards and protections in terms of the use of technology against migrants and might have an important contribution to the respect of fundamental human rights.

◥ Portugal

Organisation: D3 - Defesa dos Direitos Digitais

Action: The EU metadata retention law, declared invalid by the Court of Justice of the European Union in 2014, was not amended until EDRi member D3 made a complaint to the Ombudsman in 2017. At the request of the Ombudsman, the Constitutional Court in Portugal decided to declare the law unconstitutional.

◥ Czech Republic

Organisation: Iuridicum Remedium

Action: Launched a campaign website that includes the "right to analogue" campaign on digital exclusion in accessing public services.

Result: As a result, only people who are doing business have to use data boxes to communicate with the state. For others, they remain upon request.

◥ Belgium

Organisation: Liga voor Mensenrechten

Action: Sent an open letter to warn that if the draft law on the collection and retention of identification data and metadata in electronic communications was adopted without adequate adjustments, this would be a danger to people's rights, such as the right to privacy and data protection, freedom of expression and information, press freedoms and professional secrecy guarantees. It would also potentially set a dangerous precedent for other Member States.

OUR IMPACT > Privacy and Data Protection > GDPR enforcement

GDPR Enforcement

Our network advocated for a strong enforcement of the General Data Protection Regulation (GDPR), through advocacy, litigation and collective complaints around issues such as Google Analytics and consent spam.

EDRi members have collectively been successful in drawing more attention to GDPR enforcement, getting traction in the European Data Protection Board's, which contains many of EDRi members' demands. The EDRi GDPR enforcement task force (noyb, LQDN, Access Now, EDRi office) also met with the EDPB on 13 September 2022 to discuss GDPR enforcement issues.

Work by members

EDRi member noyb shares model cases that drive the Austrian, French, and Italian Data Protection Authorities to decide that the continuous use of Google Analytics violates the GDPR.
These decisions were made on the 101 model complaints filed by EDRi member noyb.

Google Analytics is the most common statistics programme. While many alternatives are hosted in Europe or can be self-hosted, many websites rely on Google and thereby forward their user data to the US multinational.
The fact that data protection authorities may now gradually declare US services illegal puts additional pressure on EU companies and US providers to move towards safe and legal options, like hosting outside of the US.

EDRi members get thousands of ad tech companies to delete unlawfully collected data under the Interactive Advertising Bureau illegal consent system.
Panoptykon Foundation and a group of other civil society organisations coordinated by EDRi affiliate ICCL filed complaints claiming the consent system is illegal under the GDPR.
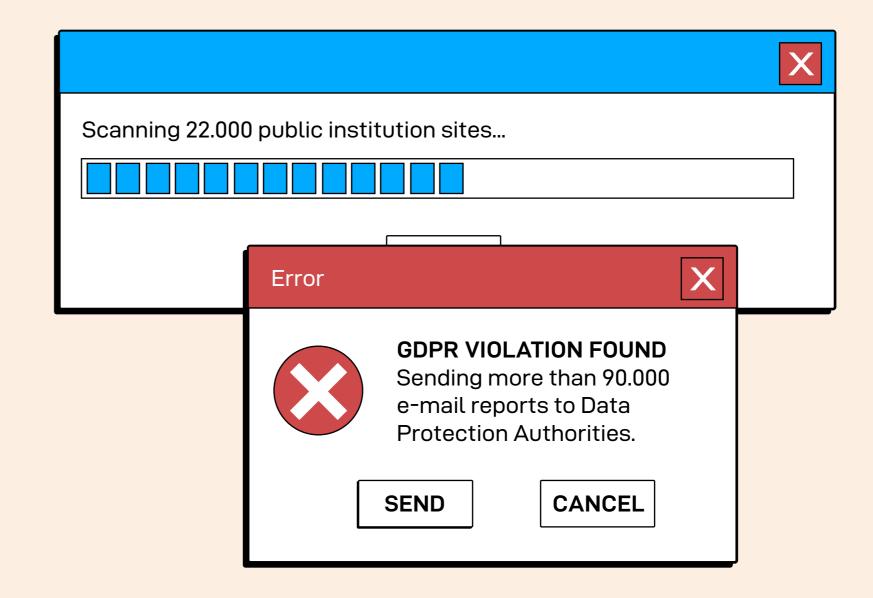
As a result, IAB Europe and thousands of ad tech companies were obliged to delete unlawfully collected data and bring their system into compliance with the GDPR. This is an opportunity to develop common standards in the EU for a more ethical and privacy-respecting alternative advertising system.

OUR IMPACT > Privacy and Data Protection > EDPR enforcement

EDRi member Hermes Center kicks out Google Analytics from public websites in Italy.

Hermes Center launched the Monitora-PA project, which focuses on public institution sites, analysing elements like trackers and cookies that can be inferred in an automated way.

The project has caused a massive decrease in the use of Google Analytics, Google Fonts, and anything else inappropriate under the GDPR on publicly-funded websites that citizens are obliged to use.
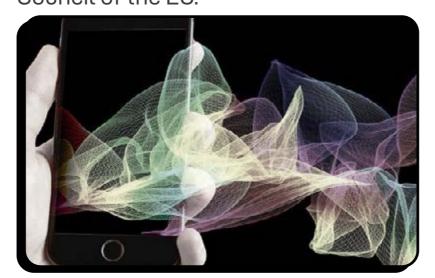
Scanning 22.000 public institution sites...

Error

GDPR VIOLATION FOUND
Sending more than 90.000 e-mail reports to Data Protection Authorities.

SEND   CANCEL

Digital Identity Reform

The European Union is about to introduce a fully harmonised digital identity system (eIDAS) with which all Europeans can manage their personal health, financial or educational documents and prove personal attributes like an age to third parties. This digital ID wallet will contain some of the most sensitive data of European citizens.

Work by members

EDRi member epicenter.works fights for more privacy in new digital identity system.

EDRi member epicenter.works published a detailed analysis of the eID project and pushed for the inclusion of the necessary privacy safeguard, making a large difference to the legislation so far and countering the dangerous position of the Council of the EU.

www.epicenter.works

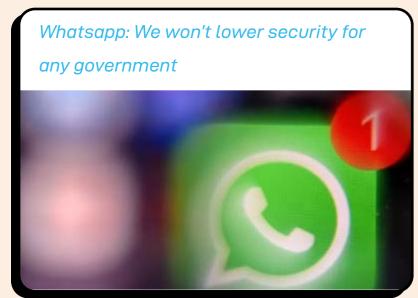**EDRi member Liga voor Mensenrechten works to ban fingerprints on eIDs in Belgium.**

In Belgium, EDRi member Liga voor Mensenrechten initiated proceedings before the Constitutional Court against the law that imposed the inclusion of fingerprints on eIDs.

However, the Court did not annul that law, so fingerprinting still exists.
But De Liga and Kinderrechtencoalitie started proceedings before the Council of State against a Royal Decree stating that children from the age of 12 would also be obliged to have their fingerprints included on their passports. The case is currently before the European Court of Justice.

Privacy and Data Protection - Our work in the press

Whatsapp: We won't lower security for any government

www.bbc.org

CSAM proposal: children first, privacy second?

www.euractiv.com

How chat control makes waves across the EU
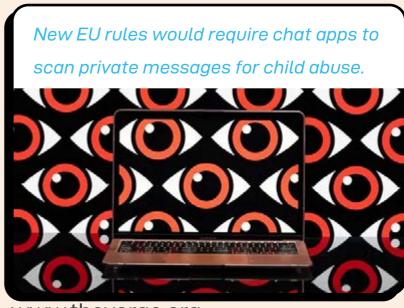
www.netzpolitik.org

New EU rules would require chat apps to scan private messages for child abuse.

www.theverge.org

Europe's Data-monster.

www.spiegel.de

EU privacy watchdog sues lawmakers over new Europol mandate.

www.Politico.eu

Europe is building a Huge International Facial Recognition System.

www.wired.com

02.2

OPEN INTERNET AND
INCLUSIVE TECHNOLOGY

◥ Our work on open Internet and inclusive technologies involves a commitment to making new digital technology and the internet stick to the promise they were built on: equal access to knowledge, openness and connection. Technologies' ubiquity has brought opportunity for progress. However, access to digital technology is vastly unevenly distributed. Technology, especially when relying on artificial intelligence, location and biometric data, can amplify social, racial and environmental injustices. We work to bring back the original purpose of an open internet and enable inclusive, sustainable technologies that work for all and for the greater good.

Artificial Intelligence

Development and deployment of artificial intelligence is one of the main technological aspects where we see how such systems have the ability to exacerbate surveillance and intrusion into our personal lives, reflect and reinforce some of the deepest societal inequalities, fundamentally alter the delivery of public and essential services, undermine vital data protection legislation, and disrupt the democratic process itself.

EDRi closely organised its work on the AI Act between members and with other civil society organisations. Together, we evaluated to what extent the IMCO-LIBE draft Report on the EU's AI Act addressed civil society's initial recommendations. After our assessment and follow-up actions, we welcomed positive changes in the report.

Together we issued 15 papers detailing the amendments of civil society to ensure that the AI Act addresses the structural, societal, political and economic impacts of the use of AI, is future-proof, and prioritises affected people, the protection of fundamental rights and democratic values.

EDRi international member Access Now, part of the AI Act coalition, led the drafting of issue papers on updating the AI Act's risk-based approach, emotion recognition, and biometric categorisation, as well as co-drafting papers on migration and AI and contributed significatly to others.

Access Now colleagues also co-led the work on general-purpose AI and the AI definition.

EDRi's recommendations made their way into the main report by the European Parliament. Specifically, we obtained that the IMCO-LIBE report suggested the following improvements of the legislation:

▼ Improvements in updating the list of "high-risk" AI applications.

▼ Predictive policing banned.

▼ Obligations for users of "high-risk" AI applications.

OUR IMPACT > Open Internet and inclusive technology > Artificial Inteligence

The rapporteurs and shadow rapporteurs of the European Parliament have also tabled some amendments suggested by EDRi member Irish Council for Civil Liberties (ICCL).

EDRi member European Center for Not-for-Profit Law (ECNL) commissioned a survey in 12 EU countries, asking a representative sample of the public about their opinion on the use of AI by governments.

The poll exposed public fears including those about AI developed or used for national security reasons, and showed stark differences with some of the positions taken by EU countries.

EDRi organised a policy forum, creating a conversation space on discrimination in AI.

This virtual policy forum, organised by EDRi, Euractiv and the Open Society European Policy Institute was a deep dive into the topic with EU policy-makers, and academic and civil society experts.

Together, we explored how the EU AI Act can be a positive force in Europe for the protection of human rights. This joint work led to the draft report (by the co-Rapporteur), which takes important steps towards a more people-focused approach.

The European Parliament must go further to empower people in the AI act.

www.edri.org

OUR IMPACT > Open Internet and inclusive technology > Artificial Inteligence

Work by members

◤ Germany

Organisation: FITUG

Action: FITUG attended the steering committee meetings as a stakeholder of the OECD.

CSISAC (Civil Society Information Society Advisory Council, Stakeholder of the OECD) represented civil society and organised panels on different topics like AI, Green IT, and Digital Human Rights.

◤ Switzerland

Organisation: Digitale Gesellschaft

Action: In February 2022, thanks to financial support given by EDRi Digitale Gesellschaft published a detailed paper in German on Automated Decision Making Systems (ADMS), taking into account their broad impact on society and related risks for civil rights violations in daily life.

Result: The paper opened the door for many critical discussions - including involvement in the Council of Europe's Committee on Artificial Intelligence.

◤ France

Organisation: La Quadrature du Net (LQDN)

Action: Fought the effects of the move by French public administrations to a fully-digital model of accessing public services. They focused on the Caisses d'Allocations Familiales (CAF), the public body in charge of social benefits, the first to use an algorithm to develop social scoring in France. LQDN tried to show the public the fact that this technology is in the service of exclusion and harassment of the most vulnerable.

Result: Thanks to the papers LQDN published and their active public awareness work, the subject rose in the public debate and media.

OUR IMPACT > Open Internet and inclusive technology > Biometric Mass Surveillance

Biometric Mass Surveillance

EDRi's campaign Reclaim Your Face gathers wide political support for a ban on biometric mass surveillance.

The EDRi-led Reclaim Your Face movement, which started in 2020, continued to build its impact on the banning of biometric mass surveillance in Europe.

The campaigning and advocacy push by NGOs has been recognised by the Renew Group in the European Parliament as helping to secure a "change of mood" on facial recognition and other forms of biometric mass surveillance in the AI Act.

As a result, 24 key MEPs in the leading committees on the file in the European Parliament demanded in September a ban on Remote Biometric Identification.

Campaigners and advocates involved in the campaign gathered in Brussels in November 2022, met with MEPs in the weeks and months preceding amendments and organised an open letter.

The year 2022 also saw the end of the Reclaim Your Face European Citizens' Initiative, a petition calling for a ban on biometric mass surveillance.

At the end of the petition signature collection, we counted over 78,000 supporters who expressed a clear stance against such uses of AI technology.

http://reclaimyourface.eu

Activists at the European Parliament before meeting MEPs

OUR IMPACT > Open Internet and inclusive technology > Biometric Mass Surveillance

Work by members

◣ Greece

Organisation: Homo Digitalis

Action: Their most significant achievement was the €20 million fine imposed by the Hellenic Data protection Authority (DPA) to Clearview AI, following their complaint in alliance with the EDRi members Privacy International, noyb and Hermes Center, among others.

Result: The highest fine ever imposed by the Greek DPA, which also required Clearview AI to delete and stop processing data of people in Greece.

◣ Austria

Organisation: epicenter.works

Action: Encouraged by the work of the Reclaim Your Face coalition, in particular Austrian member epicenter.works, the Austrian government adopted almost the entire EDRi ban biometric mass surveillance position in the AI Act and even dissented from the Council's pro-biometric surveillance stance.

◣ Switzerland

Organisation: Digitale Gesellschaft Schweiz

Action: Together with AlgorithmWatch Switzerland, they initiated the "Gesichtserkennung stoppen" ("Stop Facial Recognition") campaign in Switzerland.

Result: This resulted in broad debates in many cities in Switzerland and tangible political efforts being initially submitted in the cities of Lausanne and Zurich. The cities of St. Gallen and Zurich set an example and banned facial recognition in public spaces.

◣ Czech Republic

Organisation: Iuridicum Remedium

Action: Supported an open letter to the Czech Presidency of the EU in October and collected signatures for the Reclaim Your Face-led European Citizens' Initiative.

Result: The Czech Presidency took some of the proposed amendments on biometrics terminology and added them to the Council position, which was then approved.

Biometric mass surveillance explainer video

www.youtube.com

◥ Italy

Organisation: Hermes Center

Action: Collected signatures and distributed campaign material in Milan in May 2022, and organised a public conference in collaboration with the EU Green party, hosted by MEET - Center for Digital Culture in Milan.

◥ France

Organisation: La Quadrature du Net (LQDN)

Action: They started an initiative called "Technopolice" to collect information about the progressive outbreak of automated surveillance in France.
This action reached a new milestone in September 2022 as collective complaints against the French Minister of the Interior, carried by 15,248 people, were filed before the CNIL (the French data protection authority). These complaints required to ban surveillance cameras, facial recognition and massive police databases.

◥ Serbia

Organisation: SHARE Foundation

Action: Led the public effort to oppose the Draft Law on Internal Affairs which contained provisions which would effectively legalise biometric mass surveillance. They also published a position paper which explained our arguments against biometric mass surveillance of public spaces.

Result: After pressure from experts and civil society in Serbia, as well as international political actors, the government revoked the draft law in the final days of 2022 and announced a new round of public consultations in early 2023. With EDRi Brussels Office support, SHARE Foundation successfully got 9 MEPs to sign the open letter to the Serbian Government to revoke the draft law.

Share Foundation sent comments about the new Draft Data Protection Impact Assessment which the Serbian Ministry of Interior wrote for the biometric video surveillance system in Belgrade. This attested to the recognition by the government of the need to include civil society more actively in processes concerning the video surveillance system.

OUR IMPACT > Open Internet and inclusive technology > AI in the migration context

AI in the migration context

EDRi-led coalition calls on the EU to protect people on the move and migrants from AI harms.

Protect Not Surveil

AI is being developed, tested, and deployed within a broader framework of racialised suspicion against people crossing borders. Many of these systems are inherently discriminatory, pre-judging people on factors outside of their control.

To voice the need for the European Parliament to better protect people in the migration context against these harms, in 2022 EDRi formed a coalition with Access Now, Refugee Law Lab and PICUM. Together, we led 195 organisations and individuals to call on the EU to better address the harms of AI in migration.

Impact by country

◥ Greece

Organisation: Homo Digitalis

Action: Conducted research on the supply and development of the IT systems IPERION and KENTAUROS, deployed in the Greek islands, in the facilities hosting asylum seekers.

Result: The Hellenic DPA replied within a few weeks to the request, which normally takes months, and started an official investigation against the Ministry of Asylum and Migration, requesting the related Data Protection Impact Assessment.

◥ United Kingdom

Organisation: Statewatch

Action: Worked with the AI coalition to develop a position of the AI Act in relation to asylum, immigration and borders.

Result: Published a report funded via a grant from EDRi, that looked at existing EU investments in "border AI" and how the proposed Act would or would not regulate those technologies and use cases.

◥ Austria

Organisation: epicenter.works

Action: Concluded their campaign against the algorithmic scoring of job seekers in Austria with an impactful tour in front of all job centres in Austria.
They created a slot machine to showcase how this automated decision making is discriminating against women, older people, migrants and other groups.

#PrivacyCamp22

A major milestone in 2022 was Privacy Camp. For this 10th edition the theme chosen was "digital at the centre, rights at the margins".

A total of 900 participants registered for the online event, which was led by a Mistress of Ceremonies, and included 16 moderators and 47 speakers contributing to 13 panels and representing 5 continents.

The panels explored the discriminatory practices embedded in the gig economy and migration control, the power dynamics between public and private data and tech dependency, and how collectives are challenging unequal power structures by working on alternatives such as a feminist internet, among others.

During the event, we moved beyond empty calls to put "the (undefined) human at the centre" into a genuine consideration of digital rights. We discussed why we need to stop data retention practices, how to include marginalised voices in the process of de-centring tech, and how AI-powered technology perpetrates harms in the criminal legal cycle.

In just a week, EDRi reached 62,817 impressions on Twitter in relation to Privacy Camp and struck a 1.5 million reach with the #PrivacyCamp2022 hashtag, with the peak being on the day of the event.

The impact of the event is also evident in the 100+ messages we received from #PrivacyCamp fans, who expressed their best wishes for the conference's anniversary. The event was supported by 10 partners contributing to various extents, reaching the largest number of partners in the event's history.

Free Software

EDRi member FSFE demonstrates how AI can be better with free software.

EDRi member Free Software Foundation Europe (FSFE) underlined how AI can be more verifiable, trustworthy, and innovative with Free Software, and made policy recommendations.

They have also been following the AI Act to ensure Free Software is included.

The European Parliament passed a resolution on AI with a huge majority, saying that public procurement should require Free Software, where appropriate, with the goal of encouraging cross-border collaboration.

The FSFE kicked off the Device Neutrality initiative to promote strategies for regaining control over devices. In 2022, they dedicated efforts to getting Device Neutrality into EU legislation.

The FSFE also worked on the upcoming EU legislation targeting to redefine the current ecodesign criteria for environmentally friendly products. In preparation, they provided an in-depth study on software sustainability and its interplay with device neutrality.

EDRi member FSFE brings young people together to discuss tech. Their goal is to make more young people aware of Free Software by Youth Hacking 4 Freedom encouraging them to tinker and experiment with technology.

It is a chance for young people to discuss and network with important people in the fields of computer science and Free Software.

The winners are rewarded with a trip to Brussels and a cash prize, which might turn into an investment for their own project.

The first year of the competition was a success with wide participation and well-made winning projects.
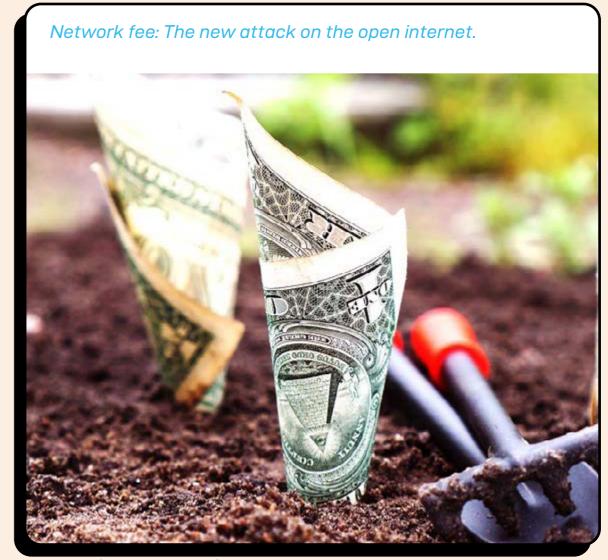
Telecommunication and net neutrality

EDRi member epicenter.works debunks the biggest myths about net neutrality.

epicenter.works worked to counter the proposal by the European Commission that would undermine the free and open internet, pushed by the big telecommunications industry.

Under the "Fair Share" term, the telecommunications industry is demanding that, in the future, online content providers should pay for their services to be accessed on the network of telecom providers.

This would mean paying twice for the same data, since we all already pay a fee for our internet connections.

Network fee: The new attack on the open internet.

www.epicenter.works

Open Internet and Inclusive Technology - Our work in the press

Discrimination and surveillance: Can the EU Artificial Intelligence Act fix injustice?

www.euractiv.com

Personal information on sale on eBay.
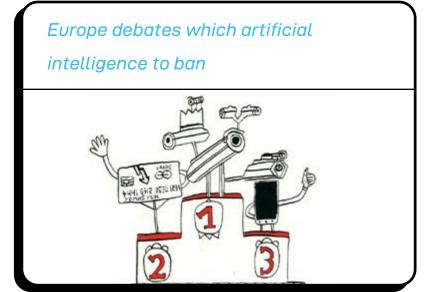
www.nytimes.com

The AI Act: EU's chance to regulate harmful border technologies.

www.news.trust.org

Europe debates which artificial intelligence to ban

www.wired.it

Europe debates which artificial intelligence to ban

www.radio1.cz

The AI Act: EU's chance to regulate harmful border technologies.

www.news.trust.org

Rise of high-tech border industry.

www.bbc.co.uk

02.3

INFORMATION

DEMOCRACY

◥ The current Big Tech business model and oppressive state deployment of technology have been amplifying societal injustices, creating dangerous power imbalances that harm people's freedom of expression, and freedom to access information. This negatively impacts our democracy.

Platform Regulation

Digital Services Act (DSA)

EDRi-led efforts mobilise people across Europe to take back their power from online platforms during DSA negotiations.

In January 2022, the work of EDRi and its partners led to positive results in the vote of the European Parliament plenary on the Digital Services Act.

EDRi was part of the movement mobilising people to ask the European Parliament to end online surveillance advertising, together with individual organisations in the PeopleVsBigTech group and beyond.

The tracking-Free Ads Coalition, in which EDRi was a founding partner, played a key role in securing a political majority and creating a common front towards the Council negotiators.

In March, EDRi coordinated a campaign letter regarding dark patterns and surveillance advertising reaching **20 Members States officials in 11 countries, and 72 supporting organisations**.

The network also initiated and co-signed a letter aimed at President Macron, in the wake of news that the French Presidency would be watering down its commitments.

EDRi achieves a European and global impact for the adoption of the Digital Services Act.

EDRi member Access Now was in coalition with NGOs in Europe and globally **pushed back against a media exemption proposal within the DSA** that would have a detrimental impact on media pluralism and overall protection of fundamental rights in the EU and beyond.

During the plenary vote, civil society managed to include in the European Parliament's position proposals to **restrict the use of people's most sensitive personal data to target them with paid messages.** MEPs also agreed to prohibit the use of "**dark patterns**", so-called manipulative interfaces that are designed to trick users into unintentionally consenting to sharing their personal data.

In May, EDRi hosted a Twitter space on the DSA, gathering several policy experts from the network working on the topic. The discussion highlighted the importance of the DSA, what it means for the regular users and what's coming next.

Digital Markets Act (DMA)

EDRi impacts the DMA law to ensure open, fair, and competitive digital spaces.

Following intense trilogue negotiations, a political agreement was reached on 24 March 2022.

The new legislation set to challenge the strongly-centralised digital environment in which Big Tech platforms exert an incredible amount of power over our digital lives and over the information flows in society.

EDRi member Internet Society develops an educational programme to raise awareness about disinformation.

The chair of the Board of the Internet Society – Bulgaria, Veni Markovski, was among the experts appointed by the European Commission to work on a report and guidelines for tackling disinformation through the education system.

The report and guidelines were released in October 2022, and have been widely recognised as a meaningful tool to fight the negative impact of disinformation on the societies in EU member states.

EDRi includes an interoperability clause in one of the most important laws of the decade = the DMA.
Privacy International successfully included amendments in the DMA on interoperability, data protection and role of Civil Society Organisations (CSOs) in the implementation of the act.

OUR IMPACT > Information Democracy >Platform Regulation

Work by members

◤ Poland

Organisation: Panoptykon Foundation
Action: Successfully advocated against two dangerous draft law proposals. Helped stop the proposal for domestic regulation of online platforms and convinced the government to halt the launch of the Integrated Analytical Platform, i.e. new analytical tool of the Polish administration that could have been used to analyse information about Polish citizens for political purposes.
Result: It was put on hold until legislation is passed to reduce the risk of abuse.

◤ Ireland

Organisation: Noyb
Action: Filed complaints on behalf of users of Facebook and Instagram over the lack of a legal basis for serving personalised advertisements in the EU.
Result: The Data Protection Commission found Meta Ireland's processing of personal data for behavioural advertising to be unlawful, and fined the company €390 million in total (for the violations on Facebook and Instagram platforms).

◤ International

Organisation: EPIC
Action: Responded to the Federal Trade Commission 's call for comments with a 230-page report.
The report put forward numerous recommendations for how the Commission can better protect consumers in the digital era, including by calling for a data minimisation rule, limits on automated decision-making systems, a prohibition on deceptive design practices, and more.

OUR IMPACT > Information Democracy > Platform Regulation

◥ Germany

Organisation: Gesellschaft für Freiheitsrechte (GFF).

Action: Supported the NGO GoliathWatch against arbitrary blocking on Facebook. GoliathWatch had previously been blocked for vague reasons such as disseminating "fraudulent, misleading or illegal information".

Result: The Hanseatic Higher Regional Court issued that high hurdles must be met before a page can be blocked.

◥ Czech Republic

Organisation: Iuridicum Remedium (IuRe)

Action: Scored a major win convincing public administration to get rid of Google Analytics and to start using the more privacy-friendly Matomo tool. The state's rejection of Google's services because of privacy concerns had a huge educational and awareness-raising effect.

◥ Netherlands

Organisation: Bits of Freedom

Action: Joined forces with PILP to investigate how Big Tech is restricting the freedom of communication of civil society organisations in the Netherlands, and what legal tools and opportunities exist to do something about it.

Freedom of expression and information

2022 kept freedom of expression and information among the top priorities of work for the EDRi network. Collectively, our activity touched on banning the use of personal data in political advertising, tackling disinformation and internet throttling, and followed the implementation of EU legislation around copyright and terrorist content.

EDRi mobilised civil society to call for a ban on the use of personal data in political advertising.

Many EDRi members signed a civil society letter with the European Partnership for Democracy and other NGOs, on the European Council's proposed general approach to the Regulation of Political advertising. The open letter called for a Regulation that delivers on democracy and fundamental rights.

In the early opinions from the Parliament, there was a consensus to reduce the use of personal data in both targeting and ad-delivery techniques for online political advertisement.

OUR IMPACT > Information Democracy >Freedom of expression and information

Work by members

▼ Turkey

Organisation: Alternatif Bilisim

Action: Alternatif Bilisim, an EDRi member in Turkey, applied to the Ombudsman Council and filed a complaint on bandwidth throttling by the government after the Istanbul/Taksim bomb attacks.

Turkey is facing serious challenges when it comes to platform regulation and risks of online censorship, especially affecting journalists, human rights defenders and LGBTIQ activists.

Alternatif Bilisim's efforts, along with the "Freeweb Turkey" and "Internet is Life" coalitions, and the dissemination of EDRi's positions have supported the reaction from civil society.

▼ Croatia

Organisation: GONG

Action: EDRi affiliate GONG organised an international conference "European Perspectives: Impact of Disinformation on Health of Democracy and the Digital Environment" in May in Zagreb, as part of the project "Pro-fact: Research, education, fact-check and debunk COVID-19 related disinformation narratives in Croatia".

They combated digital COVID-19 disinformation through scientific research, public result dissemination, and media literacy improvement activities.

▼ Finland

Organisation: Electronic Frontier Finland

Action: Electronic Frontier Finland submitted a complaint to the Chancellor of Justice as the national Copyright Directive implementation was rehashed by the minister bringing in a consultant "as an outside expert to fix the problems".

As a result, the Chancellor of Justice drew the attention of the Ministry of Education and Culture to the fact that law preparation is one of the ministries' core tasks and should not, as a rule, be outsourced.

OUR IMPACT > Information Democracy >Freedom of expression and information

◥ Bulgaria

Organisation: Digital Republic

Action: EDRi member Digital Republic was actively involved in the implementation of the CDSM Directive.

Throughout the national implementation process the association has been the only actor advocating for user rights and greater opportunities for institutional users such as Cultural Heritage Institutions.

In the last version of the government's implementation proposal of November 2022, many of Digital Republic's considerations were taken into account.

◥ The Nederlands

Organisation: Bits of Freedom

Action: EDRi member Bits of Freedom developed a four-part video series: "Data. Zo zit dat" ("Data. This is how it works."), in which Fresku, the Dutch rapper and Ambassador for Freedom, works together with four young people to discover what data is all about.

Data. Zo Zit Dat.

Fresku
Ambassadeur
van de Vrijheid

www.youtube.com

◥ Denmark

Organisation: IT-Pol

Action: EDRi member IT-Pol succeeds in getting removal orders to be made by competent authority in Denmark. Their advocacy on the Danish implementation of the Terrorist Content Online Regulation persuaded a majority in the Parliament to vote for amendments that made a competent authority responsible for issuing removal orders instead of the police..
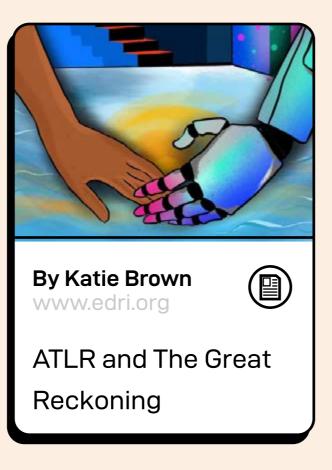
The future is now

EDRi develops short stories depicting a shared vision of our digital futures where everyone's voice is heard.
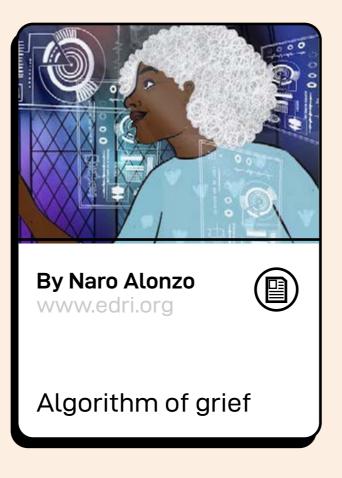
EDRi developed 4 utopian fictional short stories to help us reimagine and reinforce healthy alternatives to the current systems.

A future in which people, the planet and technology connect to build a people-centred, democratic society.
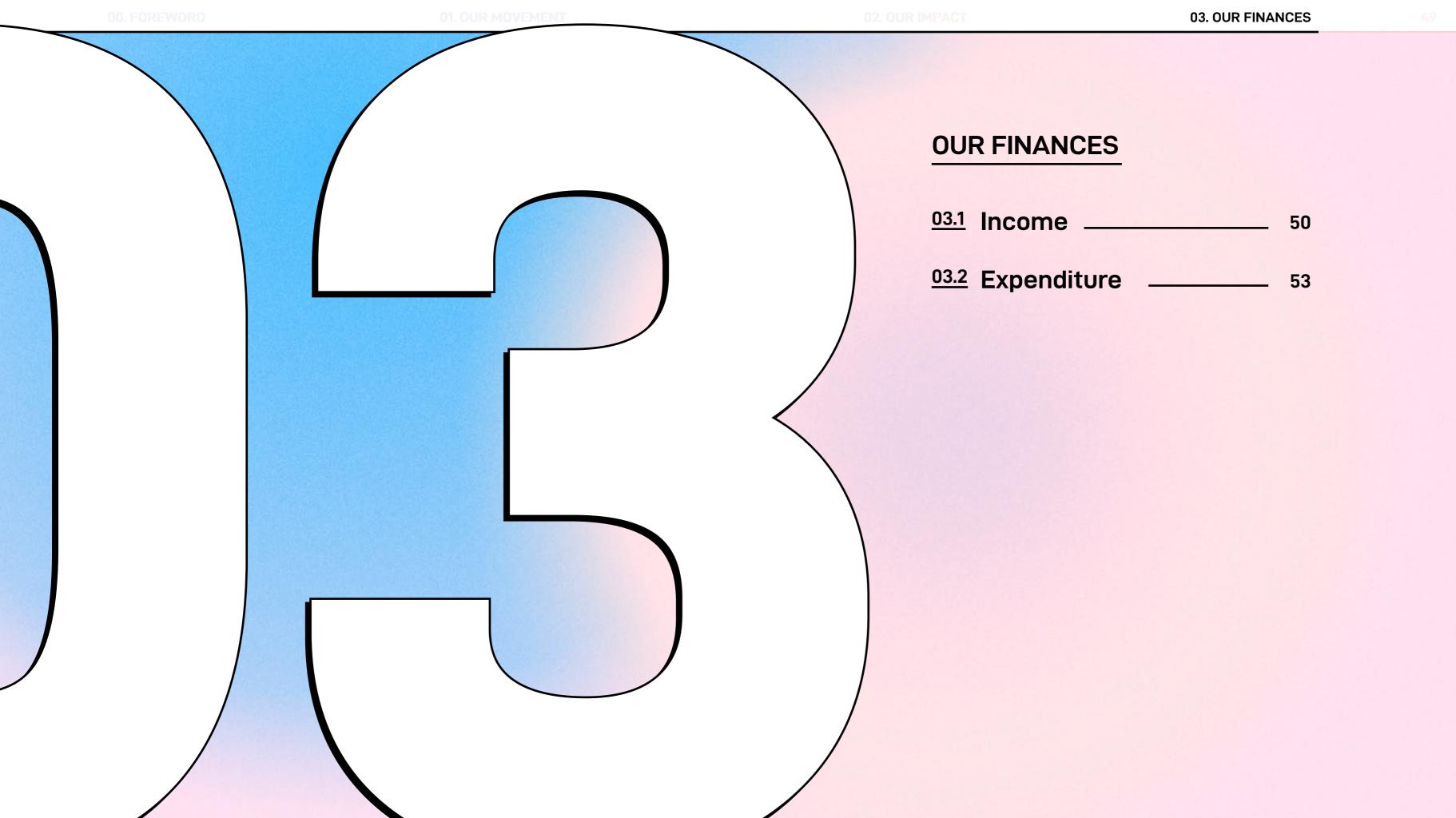
Together with broader systemic changes, and all of the vectors of change that EDRi mobilises, these stories are contributing to supporting real change.

By Bunny McFadden
www.edri.org

Disclosure

By Katie Brown
www.edri.org

ATLR and The Great Reckoning

By Naro Alonzo
www.edri.org

Algorithm of grief

By Naro Alonzo
www.edri.org

13 ways of looking at a CCTV

OUR FINANCES

Income

An organic and sustainable financial growth helps the EDRi network to respond to the complexity of the challenges we faced.

EDRi's total income grew from €1, 370, 718 in 2021 to €1, 874, 099 in 2022.

In 2022, EDRi continued to grow its yearly income, which still remains under the €2m mark. Our financial needs reflect the growing number of member organisations, and the broadening scope of our collective work.

This level of income was made possible thanks to the unwavering support of our foundation partners, including the Open Society Foundations, the Ford Foundation, the Adessium Foundation, the Democracy and Media Foundation, Luminate and Stiftung Mercator.

The MacArthur Foundation also started providing multi-annual funding to EDRi. Our financial stability has been further bolstered by support from more recent pooled funds: Civitates, a philanthropic initiative for democracy and solidarity in Europe, and The European Artificial Intelligence & Society Fund.
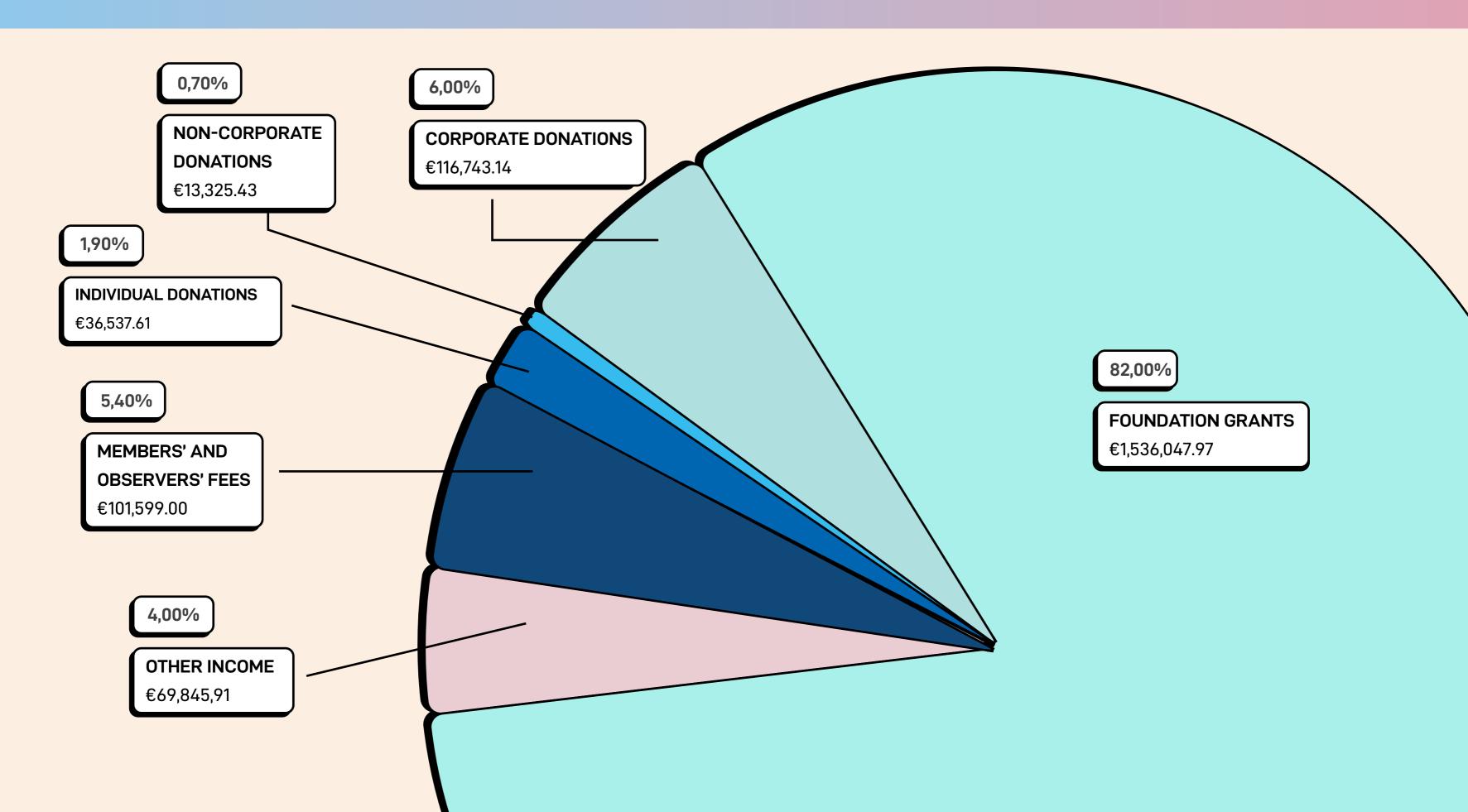
EDRi's funding streams continued the trends of previous years, with the highest proportion of funding originating from foundation grants.

The remaining part of the organisational funding originated from corporate donations, EDRi network members' and observers' yearly fees or donations received from individual donors.

The income from individual donors slightly decreased compared to 2021. This may be the result of the cost-of-living crisis and financial pressure on individual donors, impacting their ability to donate to NGOs (cost-of-giving crisis), a trend widely reported by the non-profit sector across Europe.

EDRi continues to work in a systemic way to diversify its income sources and increase its financial resilience.

0,70%

NON-CORPORATE
DONATIONS
€13,325.43

6,00%

CORPORATE DONATIONS
€116,743.14

1,90%

INDIVIDUAL DONATIONS
€36,537.61

5,40%

MEMBERS' AND
OBSERVERS' FEES
€101,599.00

4,00%

OTHER INCOME
€69,845,91

82,00%

FOUNDATION GRANTS
€1,536,047.97

MEMBERS' AND OBSERVERS' FEES	€101,599.00

INDIVIDUAL DONATIONS	€36,537.61

NON-CORPORATE DONATIONS	€13,325.43
European Data Protection Supervisor (EDPS)	€7,685.95
Electronic Privacy Information Center (EPIC)	€4,479.48
Electronic Frontier Finland (EFFi)	€660.00
Center for AI and Digital Policy (CAIDP)	€500,00

CORPORATE DONATIONS	€116,743.14
Mozilla	€34,915.00
Apple	€27,500.00
DuckDuckGo	€23,984.14
Twitter	€10,000.00
Kobler	€5,000.00
Ommm Ventures	€5,000.00
nordvpn	€2,500.00
Nextcloud	€2,500.00
Aiven	€2,334.00
Surfshark	€1,000.00
Vivaldi Technologies	€500.00
Blockdev / Mysterium Network	€500.00
Clever Cloud	€500.00
ContactOffice / Mailfence	€450.00
Netsend	€60.00

FOUNDATION GRANTS	€1,536,047.97
Open Society Foundations	€243,738.56
Ford Foundation	€204,476.14
Stiftung Mercator	€204,200.00
Luminate / The Omidyar Group	€201,986.82
Open Society Initiative for Europe	€143,411.71
Adessium Foundation	€105,300.00
Civitates	€100,829.60
Limelight Foundation	€90,000.00
European Artificial Intelligence Fund	€83,411.81
Democracy and Media Foundation	€36,154.95
Digital Freedom Fund	€34,585.82
European Cultural Foundation	€28,872.50
Avast Foundation	€25,244.03
MacArthur Foundation	€12,551.46
Public Citizen Foundation	€8,402.05
SHARE Foundation (SEE project)	€6,768.00
NetGain Partnership	€6,114.52

OTHER INCOMES	€69,845.91
Other incomes	€5,385.80
Sub-renting of the office and related costs	€64,460.11

TOTAL OPERATING INCOME	€1,874,099.06

Expenditure

EDRi's total expenditure grew from €1,272.260 in 2021 to €1,702.578 in 2022.

Thanks to a consistently growing income, EDRi was able to strengthen both direct and indirect programme expenses, as well as its core mission expenses.

The largest parts of expenditures were allocated towards advocacy work (31%), campaigns and communications (24%) and EDRi network development (21%).

EDRi keeps its expenses on human resources, finance and administrative management as low as possible (18%) and the expenditures related to the fundraising reached 6% - however, building a resilient and sustainable organisation concurrently goes with investing into support functions of organisation.

The EDRi team consisted of 15 staff members by the end of 2022, and EDRi also welcomed a communications intern from October 2022 onward.
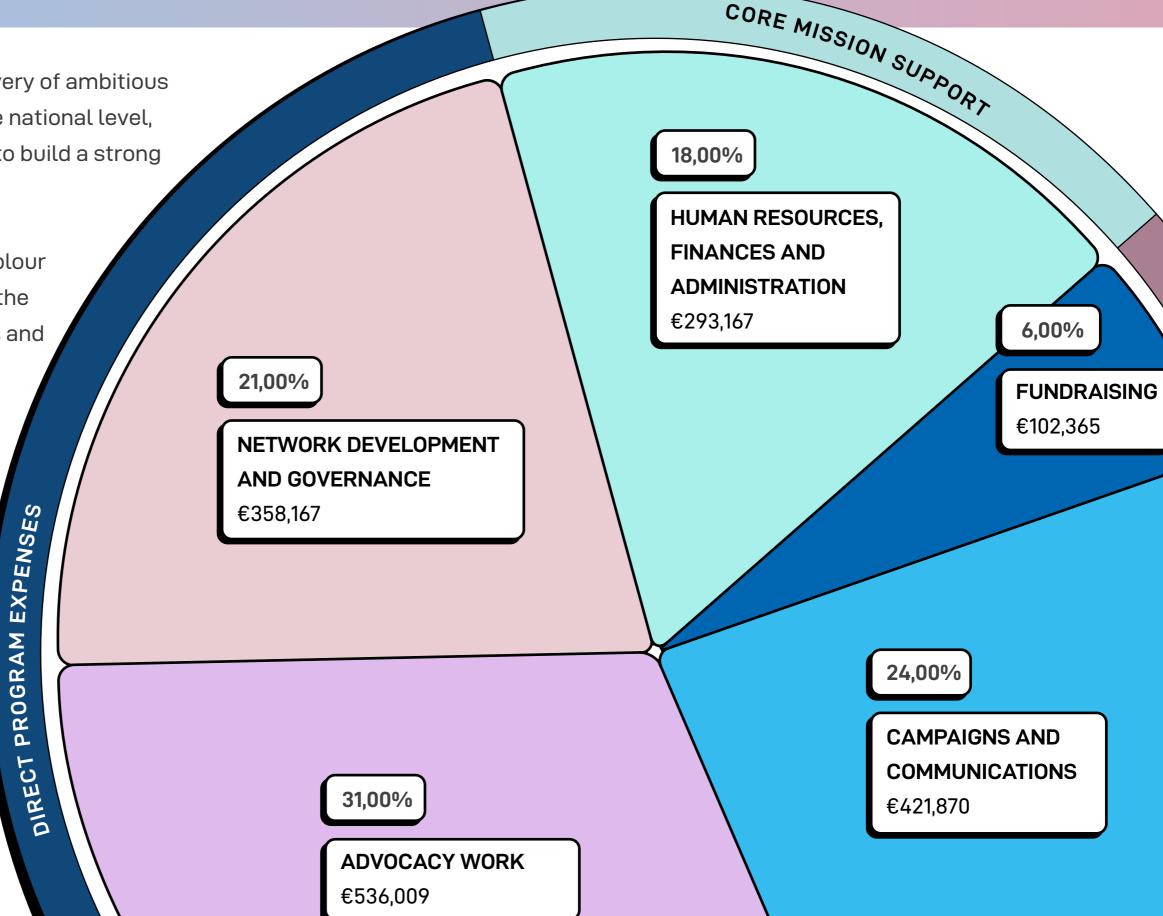
In addition to knowledge-sharing, community building and collective work, EDRi was able to continue and to enhance the regular financial support to the network members via its internal donation scheme.

The amount of the available funding increased from nearly €53,000 in 2021 to €132,000 in 2022.

This scheme contributes to the delivery of ambitious advocacy and campaign plans at the national level, and it supports EDRi in its objective to build a strong and resilient digital rights field.

The main events of 2022 were the Colour of Surveillance Europe Conference, the General Assembly of EDRi members and Privacy Camp.

EDRi continued to build its operating reserve and a designated Social Reserve Fund, providing it with a certain degree of financial security.

CORE MISSION SUPPORT

DIRECT PROGRAM EXPENSES

INDIRECT PROGRAM EXPENSES

18,00%

HUMAN RESOURCES, FINANCES AND ADMINISTRATION
€293,167

21,00%

NETWORK DEVELOPMENT AND GOVERNANCE
€358,167

6,00%

FUNDRAISING
€102,365

24,00%

CAMPAIGNS AND COMMUNICATIONS
€421,870

31,00%

ADVOCACY WORK
€536,009

DONATE NOW:

EDRi

EUROPEAN DIGITAL RIGHTS

European Digital Rights (EDRi) is the biggest European
network defending rights and freedoms online.
We promote, protect and uphold human rights and the rule of
law in the digital environment, including the right to privacy,
data protection, freedom of expression and information.