
Annual Report 2024

For an inclusive
and equitable digital environment

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OPENING WORDS

In 2024, we focused on actions that reinforced a **coherent rights- and justice-based vision and strategy in uncertain times**. Ahead of the European elections, EDRi and its allies published *a manifesto for digital futures*, paving the way for **bold and ambitious demands to inform our work for technologies that serve people, democracy and the planet**.

Our positive vision, supported by over 30 organisations and 40,000 people, *was delivered to EU policymakers* in October, as **we convened the “Tech and Society Summit”**. We brought together more than 350 people, including several Members of the European Parliament and other EU decision-makers, civil society representatives and journalists, at the first-ever *tech policy summit* not financed by Big Tech corporations in Brussels.

There were many highlights in 2024 that show EDRi’s impact. However, below we would like to spotlight a few.

Following a Digital Services Act *complaint* from EDRi with its members Gesellschaft für Freiheitsrechte and Bits of Freedom, and partner Global Witness, **LinkedIn stopped its practice of allowing advertisers to target adverts based on sensitive personal data** such as sexuality, political opinions and race.

The European Data Protection Board took into consideration some of our concerns over Meta’s *“Pay or Okay” model*, which foresees that users can decide to **either pay for privacy on Meta’s platforms, or agree to have their data processed**—essentially putting our human rights up for sale.

EDRi visibly highlighted the **continuum of colonial historical surveillance of people on the move** and how technology facilitates the violent treatment given to migrants in the EU, via, among other things, the reform of the EU’s asylum database, *Eurodac*.

The EDRi network continued to be *instrumental* in **stopping the EU Council from adopting a pro-mass surveillance and encryption-breaking position on the controversial Child Sexual Abuse Regulation**, with the block of Member States lasting through the whole year.

As we prepared for a new strategy cycle, we took stock of our positions, tactics and goals in uncertain times. The results of the European elections and of many elections across the continent and beyond, have changed the reality of our field, and pose serious harm to people and the environment. The digital human rights standards that we worked so hard to secure in the last mandates are being undermined. Pushing for a **forceful deregulation agenda**, the European Commission leadership and many EU Member States have chosen to side with the interests of industry and large corporations rather than the public interest.

Europe is sitting at a crossroads and holding its breath for peace, safety and democracy in the context of **heightened geopolitical tensions**. Technology and tech policy are at the heart of these tensions. Any vision to decrease our dependence on Big Tech should centre on peace, safety, human rights and environmental standards rather than feeding profits, surveillance or war.

As EDRi internally kick-started its *leadership transition*, unprecedented times called for unprecedented actions. Moving forward, EDRi will remain true to its values and continue to **hold the line to protect human rights in current and future legislation against corporate capture, promote just, safe and sustainable digital futures, and stand in solidarity** with communities affected by technological harms, funding cuts and attacks, in Europe and beyond.

Claire Fernandez, *Executive Director*
and **Andrej Petrovski**, *President*

1. Our Movement

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2024 was a pivotal year for Europe, with the European elections held in June. Ahead of this landmark, EDRi published its *visions for digital futures*. This manifesto is the result of the network's desire to put forward proactive visions for what we aim for, as a counterbalance to the reactive stance we are often compelled to take in response to proposals from EU institutions. Based on consultations with many EDRi members and partners, the visions were assembled and complemented by policy recommendations for the years ahead. Broad and ambitious, the visions are intended to serve as guiding stars—shaping our work and inspiring our supporters and elected officials to champion technology that serves people, democracy and the planet.

The visions were disseminated via EDRi communication channels, sent to European parties ahead of their own manifestos for elections, and formed a starting point for policy meetings with senior officials of the European Commission working in the technology, justice, climate and home affairs units. Together with members, the EDRi Office sent the manifesto to hundreds of Members of the European Parliament (MEPs) who were expected to be re-elected, tailored to twelve of the EU's national languages. Some EDRi members also issued their own manifesto, like *ARTICLE 19*.

A total of 30 organisations backed the visions through their endorsement of a *supporters' petition* derived from the manifesto. These include EDRi members, as well as organisations working on migration, anti-poverty, gender justice, environmental justice, corporate accountability and youth rights.

EDRi disseminated its vision, with features in *European Alternatives* and *Context* (by Reuters). We reacted swiftly to the election results, being quoted in EU affairs outlets such as POLITICO. In September, we ran a POLITICO newsletter campaign, after new MEPs entered into office and as EDRi was preparing its landmark event, the "Tech and Society Summit". It was delivered to over 130,000 in-mail subscribers, with some of EDRi's content being five times more engaging than the publication's benchmark.

Boosting internal and external capacity on European tech policies and EU decision-making processes.

Along with several members and partners, including Access Now, The Irish Council for Civil Liberties (ICCL) and the European Disability Forum (EDF), we participated in the European Liberal Forum (ELF) workshop to co-design future AI demands for new

lawmakers in the Renew Group. Separately, **the EDRi Office ran an online training session for its members with the aim of demystifying the European decision-making processes.** Around 20 people participated, boosting their knowledge of EU elections.

In September, EDRi led a *"20 years of digital rights and EU tech policy"* **event for new MEPs and their teams. In collaboration with members Access Now and ARTICLE 19**, this event attracted around 45 participants from various parts of the political spectrum. Colleagues from EDRi, Access Now and ARTICLE 19 presented how laws like ePrivacy and the GDPR have shaped the field, as well as newer regulatory movements around platforms, AI and state surveillance. This event laid the groundwork for deeper engagement with political advisors from several groups.

In December, EDRi was invited to speak to the Civil Liberties working group of the Socialists and Democrats (S&D) alliance. This was an important opportunity to share our perspective on law enforcement and human rights issues with MEPs. It was also useful because, as in many political groups, issues like online safety are leading some lawmakers to adopt a more "protectionist" stance on safety and security issues. EDRi was able to present a holistic digital human rights perspective and highlight its importance. We also spoke alongside a member organisation, the European Center for Not-for-Profit Law (ECNL), at the Renew Group's expert onboarding on AI for new MEPs.

Convening a high-level summit with over 40 CSOs to set the political agenda on tech policy.

In October, EDRi and 41 civil society organisations—including consumer, digital and human rights organisations, environmental and social justice groups, and health and corporate accountability organisations—hosted the **first-ever tech policy summit not financed by Big Tech corporations in Brussels. The Tech and Society Summit** was attended by over 350 people, including MEPs and other EU decision-makers, civil society representatives and journalists. The detailed event summary is available [here](#).

The event achieved its main objectives: for civil society organisations to frame the debate around tech policy; to foster collaborations and exchanges between the newly elected/appointed EU decision-makers and NGOs; and to promote institutional accountability around digital rights and technology. Partners were engaged and the content was elaborated jointly, with attention to the representation of affected groups on the panels and round tables.

During the summit, we also took the demands of thousands of people across Europe to seven MEPs, who accepted the "EDRi manifesto" petition signatures. Over 40,000 people supported our recent petitions, launched together with our partner WeMove Europe and co-signed by 30+ CSOs, calling on EU decision-makers to put people, democracy and the planet at the heart of our digital futures. More details are available [here](#).

Following the summit, a *joint statement* of 48 civil society organisations, *"Centering public interest in EU technology policies and practices: A civil society call to the new European leadership"*, was published during November. This call for an increased transparency and participation of civil society in policy-making puts forward a collective vision of CSOs for an EU technology policy that serves the public interest, building on the dynamic started at the summit.

Reacting to the European Commissioners' hearings in the European Parliament.

In November, EDRi received high exposure of our critical perspective on three key incoming European Commissioners, including through seven EDRi quotes in high-level EU outlets (EU Observer, POLITICO and NetzsPolitik) and live "Hot Takes" on our social media channels.

Tech and Society Summit 2024, Brussels, Belgium.

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| AFFILIATES | (A) | OBSERVERS | (O) |
|----------------------------------------------|-----|---------------------------------------------------------|-----|
| Centrum Cyfrowe | | Amnesty Tech (Amnesty International) | |
| Danes je nov dan | | Italian Coalition for Civil Liberties and Rights (CILD) | |
| Digital Republic | | Committee to Protect Journalists | |
| European Sex Workers' Rights Alliance (ESWA) | | Deutsche Vereinigung für Datenschutz | |
| Gong | | Fédération FDN | |
| Hungarian Civil Liberties Union (TASZ/HCLU) | | Pangea | |
| Irish Council for Civil Liberties | | PROSA | |
| Mnemonic | | Reporter ohne Grenzen | |
| petites singularités | | 7amleh | |
| Politiscope | | | |
| SUPERRR Lab | | | |

| MEMBERS | (M) |
|-------------------------------------------------------------------------|-------------------------------------------|
| Access Now | Gesellschaft für Freiheitsrechte (GFF) |
| Alternatif Bilişim | Hermes Center |
| Association for Technology and Internet (ApTI) | Homo Digitalis |
| ARTICLE 19 | Initiative für Netzfreiheit |
| Bits of Freedom | Internet Society – Bulgaria |
| Chaos Computer Club | IT-Pol |
| D3 - Defesa dos Direitos Digitais | Iuridicum Remedium |
| Digital Freedom and Rights Association (DFRI) | La Quadrature du Net (LQDN) |
| Digital Rights Ireland | Liga voor Mensenrechten |
| Digitalcourage | Metamorphosis |
| Digitale Gesellschaft | Nodo50 |
| Digitale Gesellschaft Switzerland | European Center for Digital Rights (noyb) |
| Državljan D | Open Future |
| Electronic Frontier Foundation (EFF) | Open Rights Group (ORG) |
| Electronic Frontier Finland (Effi) | Panoptikon Foundation |
| Elektronisk Forpost Norge | Privacy International |
| Electronic Privacy Information Center (EPIC) | Quintessenz |
| epicenter.works | SHARE Foundation |
| European Center for Not-for-Profit Law (ECNL) | Statewatch |
| Forum of Computer Scientists for Peace and Social Responsibility (FIFF) | vibelat |
| Foundation for Information Policy Research (FIPR) | Vrijschrift |
| Free Software Foundation Europe (FSFE) | Wikimedia DE |

| INTERNATIONAL | EUROPEAN | 1. Austria | 5. Czech Republic | 10. Greece | 13. Italy | 18. Romania | 23. Switzerland |
|-------------------------------------------------------------|--------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------|------------------------------------------------------------|--------------------------------------------------|---------------------------------------------------------------|------------------------------------------------------------------|
| Amnesty Tech (Amnesty International) ^(O) | Access Now ^(M) | epicenter.works ^(M) | Iuridicum Remedium ^(M) | Digitalcourage ^(M) | (CILD) ^(O) | Association for Technology and Internet (ApTI) ^(M) | Digitale Gesellschaft Schweiz ^(M) |
| ARTICLE 19 ^(M) | Committee to Protect Journalists ^(O) | Initiative für Netzfreiheit ^(M) | | Digitale Gesellschaft ^(M) | Hermes Center ^(M) | | |
| Electronic Privacy Information Center (EPIC) ^(M) | European Sex Workers' Rights Alliance (ESWA) ^(A) | Quintessenz ^(M) | 6. Denmark | Social Responsibility (FIFF) ^(M) | | 19. Serbia | 24. The Netherlands |
| Mnemonic ^(A) | European Center for Not-for-Profit Law (ECNL) ^(M) | vibelat ^(M) | IT-Pol ^(M) | Gesellschaft für Freiheitsrechte (GFF) ^(M) | 14. North Macedonia | SHARE Foundation ^(M) | Bits of Freedom ^(M) |
| Privacy International ^(M) | Free Software Foundation Europe (FSFE) ^(M) | | PROSA ^(O) | Mnemonic ^(A) | Metamorphosis ^(M) | | Open Future ^(M) |
| | European Center for Digital Rights (noyb) ^(M) | 2. Belgium | | Reporter ohne Grenzen ^(O) | | 20. Slovenia | Vrijschrift ^(M) |
| | Open Future ^(M) | Liga voor Mensenrechten ^(M) | 7. Finland | SUPERRR Lab ^(A) | 15. Norway | Danes je nov dan ^(A) | |
| | | petites singularités ^(A) | Electronic Frontier Finland (Effi) ^(M) | Wikimedia DE ^(M) | Elektronisk Forpost Norge ^(M) | Državljan D ^(M) | |
| | | | | | | | |
| | | 3. Bulgaria | 8. France | 11. Hungary | 16. Poland | | |
| | | Digital Republic ^(A) | Fédération FDN ^(O) | Hungarian Civil Liberties Union (TASZ/HCLU) ^(A) | Panoptikon Foundation ^(M) | 21. Spain | 25. The United Kingdom |
| | | Internet Society – Bulgaria ^(M) | La Quadrature du Net (LQND) ^(M) | | Centrum Cyfrowe ^(A) | Nodo50 ^(M) | Foundation for Information Policy Research (FIPR) ^(M) |
| | | | | 12. Ireland | | Pangea ^(O) | Open Rights Group (ORG) ^(M) |
| | | 4. Croatia | 9. Germany | Digital Rights Ireland ^(M) | 17. Portugal | | Statewatch ^(M) |
| | | Gong ^(A) | Chaos Computer Club (CCC) ^(M) | Irish Council for Civil Liberties ^(A) | D3 - Defesa dos Direitos Digitais ^(M) | 22. Sweden | |
| | | Politiscope ^(A) | Deutsche Vereinigung für Datenschutz ^(O) | | | Digital Freedom and Rights Association (DFRI) ^(M) | 26. Türkiye |
| | | | | | | | Alternatif Bilişim ^(M) |
| | | | | | | | 27. Palestine |
| | | | | | | | 7amleh ^(O) |

1.2. A GROWING NETWORK

The *2024 General Assembly* was hosted by EDRi's Greek member Homo Digitalis and took place in Crete, Greece.

EDRi welcomed the European Center for Not-for-Profit Law (ECNL), which transitioned from affiliate to full member in 2024. Another organisation joined under the Observer status: 7amleh, focused on protecting and defending Palestinian digital rights activism.

Overall, this resulted in *50+ members and affiliates of the EDRi network* in total by the end of 2024.

EDRi General Assembly 2024, Crete, Greece



1.3. EDRi'S BOARD

During the 2024 General Assembly, two new Board members were elected—Karolina Iwanska (European Center for Not-for-Profit Law) and Paige Collings (Electronic Frontier Foundation). In addition, EDRi members elected a new president for EDRi's Board: Andrej Petrovski from the SHARE Foundation. After Thomas Lohninger stepped down from his function in summer 2024, an additional

Board member, Jürgen Bering (GFF), was appointed directly by the Board in September 2024. The current number of *EDRi Board members* remains to be six.

1.4. EDRi'S BRUSSELS STAFF
(AS OF APRIL 2025)

Claire Fernandez (She/Her)
Executive Director

Vanessa Buvens (She/Her)
Head of Membership and Community

Katarína Bartovičová (She/Her)
Senior Fundraising Manager

Guillermo Peris (He/Him)
Senior Network and Events Manager

Jean Duclos (He/Him)
Senior Finance and Administration Officer

Andreea Belu (She/Her)
Head of Campaigns and Communications

Assita Kone (She/Her)
Junior Administration and Finance Officer

Shubham Kaushik (She/They)
Communications and Media Officer

Ella Jakubowska (She/Her)
Head of Policy

Tim Colmant (He/Him)
Graphic Design Officer

Jan Penfrat (He/Him)
Senior Policy Advisor

Chiara Miraglia (She/Her)
Communications and Campaigns Officer

Chloé Berthélémy (She/Her)
Senior Policy Advisor

Brian Donnelly (He/Him)
Campaigns Officer

Aljosa Ajanovic Andelic (He/Him)
Policy Advisor

Blue Duangdjai Tiavorabun (They/Them)
Policy Advisor

In 2024, the EDRi team elected two new staff representatives to the Staff Committee: Chloé Berthélémy and Shubham Kaushik. The Management Team consisting of Claire Fernandez (Executive Director) and Andreea Belu (Head of Campaigns and Communications) welcomed two new colleagues: Ella Jakubowska and Vanessa Buvens. Ella, previously Senior Policy Advisor, took over the role of Head of Policy from Diego Naranjo, who departed in January, while Vanessa joined as Head of Membership and Community in June. During the second half of the year, EDRi onboarded three new policy advisors: Janine Patricia Santos, Aljosa Ajanovic and Blue Tiyavorabun, waved goodbye to one of the Communication and Media Officers, Viktoria Tomova, and welcomed its Graphic Design Officer, Tim Colmant.

During 2024, the four-day-week pilot experiment was adopted as an official policy and legally reflected in contracts. The team

updated the EDRi cross-team DARCI (decision-making matrix) and finalised its recruitment policy; it held an allyship training in September, conducted the first staff pulse survey under the leadership of the Staff Committee, and reflected on shared leadership and Executive Director transition.

In December, Claire Fernandez announced her plan to step down from her position as EDRi's Executive Director at the end of June 2025 and started planning EDRi's leadership transition. Claire's reflections on her 6+ years with EDRi, during which she has led the organisation through many milestones and obstacles, complemented by additional details on the next steps for an EDRi leadership transition, are summarised [here](#). Claire and the EDRi Board, as well as the entire EDRi Office team (Management Team and staff representatives), have been actively working to ensure a smooth transition.

General Assembly in May 2025). During this period, the EDRi Office led a mapping and review of external reports, and held consultations with policymakers from across multiple EU institutions, coalition partners, and industry representatives, in addition to collecting individual feedback from EDRi members, affiliates, observers and supporters (more details in Part 2). We also held two strategy workshops addressing the infrastructural shifts caused by Big Tech's capture of everyday services and societal fabric, and the geopolitical techno-solutionism advanced by the EU. The research and various consultations have shown the importance of strategising in times of crisis and backsliding of democracy.

In the second half of the year, **EDRi launched our Participatory Grant-Making pilot scheme (PGM)**, a re-granting mechanism that is being piloted to support the implementation of strategic actions and act in solidarity with under-resourced digital rights efforts. A PGM committee was "appointed" as of November 1st, composed of representatives from Bits of Freedom, Wikimedia Europe, ARTICLE 19, external experts and an internal office lead. The committee has swiftly started working to

prepare the design and launch of our first calls for proposals. Working on the rationale and objectives of the PGM scheme and reflecting on eligibility, application modalities and key values to uphold in designing the pilot (transparency, trust and accessibility), the committee prepared two calls for proposals for 2025:

Organisational Sustainability Fund, designed to provide unrestricted funding in support of organisational investments, development and resilience;

Platforms Accountability Fund, supported by two foundations to resource initiatives that advance the implementation of the Digital Services Act (DSA) and other related initiatives to uphold platforms' accountability objectives.

STRATEGIC PLANNING, NETWORK HEALTH AND GOVERNANCE

In the lead-up to the 2024 General Assembly, there were many working group meetings, including the Directions Task Force, which prepared the EDRi value statement and other documents that followed from the October 2023 meeting. One of the Working Groups also focused on reviewing all EDRi conflict prevention mechanisms. Finally, the Strategy Task Force had a preparatory meeting before the General Assembly, with a view to kick-start EDRi's next 2025-2029 strategic cycle.

During the General Assembly, **EDRi members adopted our value statement**, providing more details about what unites us and situating EDRi's contribution in a broader context, which will form part of our upcoming multi-annual strategy. EDRi members also **adopted boundaries for EDRi's political strategy**, a document providing much-needed guiding principles ahead of the European elections, and indeed in light of the new European Parliament composition: "EDRi does not associate with people and entities who oppose the democratic project, work against the human rights of all or the rights of certain groups, either explicitly

or de facto."

This year's General Assembly was also marked by discussions resulting from diverging opinions regarding community guidelines and acceptable behaviour and language during EDRi convenings (i.e. inspired by the Berlin *Code of Conduct*). Whilst this created an opportunity to test and respond to breaches, it also led to subsequent discussions that took place in the framework of EDRi's dedicated working group tackling dispute resolution and conflict prevention approaches. Finally, **the General Assembly adopted "guidelines for keeping our dialogue productive"**—reaffirming principles of constructive dialogue in a growing network.

At the 2024 General Assembly, the EDRi multi-annual strategic planning process was kicked off, with the support of the EDRi Strategy Task Force, which led a workshop with members. The second half of the year was focused on our *next strategic planning process* for the new multi-annual EDRi network Strategy 2025-2030 (to be adopted by the



On **24 January 2024**, we brought together policymakers, activists, human rights defenders, and academics from all over Europe for Privacy Camp 2024. We came together to explore the theme '*Revealing, Rethinking, and Changing Systems*'.

"Change" was the name of the game. With the European Parliament elections later in the year and a new mandate for the European Commission, we spent the day thinking about new beginnings, how the old and new systems interact, and how we can leverage these moments for transformative change.

We welcomed more than 240 people in-person in Brussels and were joined by **over 400 people online**.

The 12 sessions of Privacy Camp brought together **over 60 experts** with knowledge and lived experience of key digital rights issues. Among the 3 stages hosting sessions in parallel, two were *broadcasting all day long* - making discussions available to all those who could not reach Brussels.

Besides EDRI's members, Privacy Camp created a forum for a wide variety of perspectives. Particularly, we highlight the active participation in sessions of representatives of organisations such as the **Federation of National Organisations Working with the homeless (FEANTSA)**, the **European Trade Union Institute (ETUI)**, the **European Environmental Bureau (EEB)**, **Workers Info Exchange**, **Tech Workers Coalition**, **Digital**

Security Lab Ukraine, as well as **European Network Against Racism (ENAR)**.

Throughout the day, participants joined panels and workshops on topics as accessibility and equity in public services, health data, data centers policy, extractivism in the name of digital green technologies, immigration and surveillance technologies, intimate image based abuse (IIBA), wartime surveillance in Ukraine as well as collective action and GDPR for supporting gig economy workers. In 2024, Privacy Camp hosted for the **seventh year in a row the European Data Protection Supervisor – Civil Society Summit**.

The Privacy Camp community reconnected and forged new ties during breaks, as well as during **the social evening programme**.

The 12th edition of Privacy Camp was organised by European Digital Rights (EDRI), in collaboration with our partners the Research Group on Law, Science, Technology & Society (LSTS) at *Vrije Universiteit Brussel (VUB)*, *Privacy Salon vzw*, the Institute for European Studies (IEE) at *Université Saint-Louis – Bruxelles*, the *Institute of Information Law (IViR)* at University of Amsterdam and the *Racism and Technology Center*.

Privacy Camp 2024, Brussels, Belgium.

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2. Work Areas

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2.1. PRIVACY AND DATA PROTECTION

Privacy and data protection are vital for our lives and connections with others. These rights allow us to work, socialise, organise, express ourselves, care for each other safely and develop our opinions, beliefs and ideas with dignity. Attempts by governments and private companies to access and abuse personal data have severe consequences on people's autonomy and freedoms, especially for human rights defenders, investigative journalists and activists. EDRi works to ensure the enforcement of data protection and privacy rules to safeguard against unlawful surveillance practices.



CONFIDENTIALITY OF COMMUNICATIONS

(CSS/CSAR, ENCRYPTION BACKDOORS, CYBERSEC)

The EDRi network played a key role in **stopping the EU Council from adopting a dangerous position on the controversial Child Sexual Abuse Regulation (CSAR)**. This step would have set the stage for final negotiations, taking the EU a step closer to “chat control”.

Our advocacy employed several tactics, including a series of open letters (in *March* and *May 2024*), press and media public pressure, an informal newsletter for allies within and outside the public *Stop Scanning Me campaign*, speaking at EU institution events, mobilising our supporters to mail their government representatives, and meeting with EU Member State representatives.

EDRi commented publicly and alerted journalists when, for the first time ever, a European Commissioner (Věra Jourová) admitted on record that the CSA Regulation would break encryption. Through this, EDRi catalysed public pressure via *news outlets*, with the topic trending on Belgian X and the Commissioner being forced to issue a *public comment* to clarify her stance.

EDRi members also targeted their advocacy strategically. We were active in **Norway** and neighbouring Nordic countries through Electronic Frontier Norway, in **the Netherlands** through Bits of Freedom, in **Portugal** through Associação D3 - Defesa dos Direitos Digitales, and in **Germany** through Chaos Computer Club (CCC), Digitale Gesellschaft, Gesellschaft für Freiheitsrechte (GFF) and SUPERRR Labs.

EDRi's coalition liaised closely with representatives from many of the blocking minority of 10 EU Member States in Council throughout the Belgian and Hungarian Presidencies, successfully ensuring that they remained opposed to the mass surveillance and/or encryption-breaking aspects of the proposed drafts.

In December 2024, the multi-annual advocacy against chat control by the EDRi network, partners, academics and other stakeholders paid off, as ten EU Member State governments made public commitments that the law would not progress until mass surveillance is ruled out and/or end-to-end encryption protected.

SPYWARE

In Greece, member **Homo Digitalis** urged *the Hellenic Data Protection Authority (DPA) and the Council of Europe* to react to the dangerous Draft Presidential Decree outlining the conditions for the procurement of spyware by government agencies.

In Germany, several members *lobbied against the so-called "Security Package"*, whilst member Gesellschaft für Freiheitsrechte (**GFF**) litigated against the proliferation of stalkerware and the unlawful expansion of the powers of the German foreign secret service.

In December, Amnesty International published *a shocking report*, in collaboration with members **SHARE Foundation** (themselves targeted by spyware) and **Access Now**, on the use of spyware against journalists and human rights activists in Serbia. The revelations led to solidarity among 50 civil society organisations who, alongside EDRi, signed an open letter demanding EU institutions take action to stop the Serbian authorities' illegal use of spyware.

The EDRi Office continued to solidify our work against spyware, collaborating with members and key civil society partners to keep this topic on the European agenda, despite reticence of lawmakers to act.

Spyware featured relatively heavily in EU media with 84 press mentions as a result of efforts to bring this topic into the public debate.

STATE SURVEILLANCE

(PRÜM II, EUROPOL, PROTECT NOT SURVEIL)

Throughout 2024, EDRi worked in partnership with academics and civil society actors as part of the Resist Europol coalition. Building on successful work in 2023 to help *empower people to claim their digital rights when dealing with Europol*, in 2024 the coalition expanded and *solidified its work*.

The Resist Europol coalition also partly overlapped with the mission of the Protect not Surveil (PnS) coalition, which was co-led throughout the year by Access Now, EDRi, Equinox Initiative for Racial Justice, Platform for Undocumented Migrants (PICUM) and the Refugee Law Lab. One focus area for the coalition was *the EU Migration Pact*, which foresees punitive and discriminatory surveillance of migrants. The coalition also worked on its analysis of the Europol reform, which is forthcoming as of the end of the reporting period, and on the lack of protections for people on the move in the final EU AI Act (see section 2.2.).

In France, our members **La Quadrature du Net** (LQDN) *launched a search engine* that analyses French “*décrets préfectoraux*” (prefectural decrees) and helps to provide transparency on administrative decisions about surveillance.

Early in the year, EDRi spoke out against the final deal on the *Prüm II Regulation*—a law to “enhance” the sharing of sensitive data, including biometrics, across EU Member States and some third countries. Whilst the final text incorporated some of the safeguards we had advocated for, there were insufficient protections for human rights. We informed lawmakers that the final text would likely be incompatible with case law of the EU Court of Justice—and therefore vulnerable to a legal challenge—ahead of a final vote in February.

SURVEILLANCE OF MIGRANTS

In 2024, EDRi continued to resist the EU's securitisation agenda, especially the surveillance of people on the move. We led efforts to **render more visible the adoption of the reform of the EU's asylum database (EURODAC)**, as part of the controversial New Pact on Migration and Asylum. Together with the Digital Freedom Fund, we *co-authored an op-ed* on the reform, raising awareness of the most pervasive forms of mass identification of asylum-seekers, refugees and migrants through biometric data processing. The op-ed reached diverse audiences across Europe, after being *translated and published* in French, Italian, German, Greek and Spanish. This work has highlighted the continuum of historical colonial surveillance of people on the move and how technology facilitates the violent treatment given to migrants in the EU.

We reacted to the *Facilitators Package*, submitting a complaint to the European Ombudsman, together with PICUM, concerning the lack of an impact assessment by the European Commission on the package

proposal, which furthers the *criminalisation of migrants and their defenders*.

The EDRi network also submitted its response to the consultation on *the new EU “travel app” proposal*, co-drafted by the EDRi Office together with Danish EDRi member IT-Pol. This problematic proposal hides border surveillance and the expansion of facial recognition behind a technocratic veneer.

In the UK, **Privacy International** led a systematic charge against the punitive and cruel treatment of migrants by challenging the Home Office's system of GPS-tagging migrants and asylum seekers. In 2024, in the span of three months, *two UK courts and one regulatory authority handed down rulings* on this policy, dealing serious blows to its legality.

Panoptikon Foundation was also successful in another case brought before the ECHR (*Bychawska-Siniarska and others v. Poland*).



Chloé Berthélémy,
Senior Policy Advisor,
European Digital Rights

“The use of biometric surveillance in EURODAC has just one explicit purpose — to increase control over migrants who have been made socially vulnerable by unfair migration policies. We have to fight harder against the regime of exception the EU is currently building in its privacy rule-book, in which people on the move get a differentiated treatment.”

DATA RETENTION AND STATE ACCESS TO DATA

EDRi member Open Rights Group (ORG) *delayed* the roll-out of the UK's eVisa scheme, thereby helping to prevent threats to and potential violations of human rights associated with digital-only means of proving a person's immigration status. These risks would be especially harmful for vulnerable groups.

In Greece, member Homo Digitalis won their case against Vodafone Greece regarding retained metadata after four and a half years. In effect, the Hellenic Data Protection Authority (DPA) forced Vodafone to revise its privacy policy, ensuring better privacy protections for hundreds of thousands of Greek Vodafone subscribers.

Homo Digitalis also catalysed the Greek DPA to fine the Ministry of Asylum and Migration with €175,000 for the Hyperion and Centaur systems. This penalty—at its time the highest ever imposed on a Greek public body—underscored the critical importance of conducting a Data Protection Impact Assessment (DPIA) from as early on as during the public

procurement phase, based on the principles of data protection by design and data protection by default. Moreover, the case highlighted the need to maintain, as a data controller, transparent communication with the DPA authorities on data processing practices.

The success of Homo Digitalis' actions speaks to the influence a coalition can have in advocating for accountability and safeguarding data protection rights in the field of migration, when the coalition members come from civil society organisations and the spheres of academia, digital rights and social justice.

Another result of this action is the creation of new avenues for collaboration between CSOs. Homo Digitalis is working on a project with the Border Violence Monitoring Network (BVMN) to examine practical gaps and lack of compliance by the Ministry of Asylum and Migration in the field, conducting interviews with asylum seekers in Samos' Closed Controlled Access Centre and compiling an analysis on the matter.

HEALTH DATA (EUROPEAN HEALTH DATA SPACE)

Following almost two years of legislative negotiations, EU lawmakers *agreed on the new European Health Data Space (EHDS) law in April 2024*. EDRi, together with campaigning organisation **WeMove Europe**, delivered *over 112,000 signatures* via petition demanding a clear obligation to ask patients for their consent before sharing health data for secondary purposes.

As a result, we convinced MEPs to adapt at least a right for patients to opt out.

Unfortunately, the final EHDS final deal with EU Member States has added many exceptions and loopholes to this right to opt-out. Our main concerns are the lack of limits on who can access this kind of data, and how it opens the door for Big Tech companies to abuse our health data for profit. Nevertheless, **our campaign nurtured debate about health data protection and led to the creation of Health Action International-led CSO coalition "Digital Rights and Health Alliance" of which EDRi is a member.**

DATA PROTECTION (GDPR ENFORCEMENT, PAY OR OKAY)

In two open letters, digital rights and consumer rights organisations, including EDRi, made it clear that people's rights are not for sale, and that the so-called "Pay or Okay" model *is incompatible with the EU Charter of Fundamental Rights*. **As a result, the opinion of the European Data Protection Board followed certain civil society recommendations that raised concerns over Meta's "Pay or Okay" model**, which foresees that users can decide to either pay for privacy on large platforms such as Meta, or agree to have their data processed.

Later in the year, the EDRi Office, together with members including **Privacy International, noyb, Access Now, ICCL, EPIC and Open Future**, participated in the stakeholder event organised by the European Data Protection Board, around the upcoming guidelines on the application of data protection legislation in the context of "Pay or Okay" models for **all websites and platforms**.

The EU Council *reached a position* on the proposal for additional **procedural rules for GDPR enforcement largely in line with recommendations from EDRi and Access Now**, significantly improving the initial proposal by the European Commission. The hope is that the future Regulation will address the challenges posed by cross-border and national procedures, which often become cumbersome and excessively lengthy, to achieve the full potential of the GDPR. EDRi also managed to influence the adoption of the European Parliament report while excluding some of the most concerning amendments.

EDRi member noyb lodged 11 complaints with DPAs (Data Protection Authorities) across the EU. ORG (Open Rights Group) also *filed a complaint against Meta* in the UK with the ICO (Information Commissioner's Office), for using users' data to train AI, and later published an enforcement gap report comparing the UK and EU, and gaps in DPA/ICO enforcement. As a result of this collective action, Meta stopped its AI plans in the EU.

Noyb filed other complaints against Google's privacy sandbox, OpenAI and SmartSchool. Finally, noyb published a report based on a survey conducted among over 1000 privacy professionals about the GDPR and enforcement.

In the Netherlands, member *Bits of Freedom tipped off* the Dutch DPA regarding Clearview AI's illegal data collection for facial recognition. As a result, the DPA imposed a fine of €30.5 million plus periodic penalty payments.

In December, noyb *obtained a long-awaited success* against the streaming platform Netflix for the violation of users' right of access under GDPR Article 15. The Dutch DPA issued a €4.75 million fine against the controller.

Open Rights Group (ORG), mobilised various stakeholder groups (who were unaware the bill would affect them) and successfully stalled a problematic Data Protection and Digital Information bill in the UK. Through their effort, ORG made those affected by the bill aware of the threats and managed to coordinate the actions of a broader coalition towards a single goal.

Finally, Croatia-based member Politoscope successfully influenced the Data Protection Reform in Bosnia and Herzegovina (BiH), achieving stronger personal data protections and a full alignment of the draft law with the GDPR. The group provided expertise and mentoring support (workshops and policy analysis) to civil society organisations during the reform of the country's data protection law. Despite ongoing and deepening political and societal divisions in BiH, the full GDPR alignment advocated by the DATA ROL project represents a meaningful step forward for digital rights and the rule of law in the country.

Our work on open internet and inclusive technology is committed to ensuring that new digital technologies and the internet build and operate on the premise of equal access to knowledge, openness and connection. The ubiquity of technology in our lives has brought opportunities for progress. However, access to digital technology is vastly unevenly distributed, and technology—especially when relying on artificial intelligence and 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.



The EU's landmark Artificial Intelligence (AI) Act finally came into effect on August 1, 2024, after a gruelling negotiation process. While the final version of the AI Act had many missed opportunities to protect our rights to privacy, equality, non-discrimination and more, there were also silver linings and opportunities to expand the modest protections of this law.

In 2024, the AI core group comprising of EDRI, over a dozen EDRI members, and several CSO partners including Algorithm Watch and the European Disability Forum (EDF), started its post-AI Act strategy work to ensure stringent and rights-respecting implementation. In the first half of the year, the AI core group started drafting a *legal and practical guide* for civil society organisations, communities and activists on fighting biometric mass surveillance after the AI Act. The group also spent time convening with other civil society actors to plan and coordinate our post-AI Act work. This included a successful EDRI application to the European Commission's drafting group on the Code of Practice on General Purpose Artificial Intelligence, and a *coordinated statement* to outline the improvements and next steps the EU must take if it truly values a human-centric, rights-protecting AI acquis.

In the latter part of the year, the group actively influenced the AI Act's enforcement guidelines through direct advocacy towards the European Commission, which was based on a rigorous final text analysis that the group conducted. The AI core group was subsequently able to submit a detailed analysis of prohibited AI practices and the definition of AI to the European Commission's public consultation in

November, which would inform the 2025 interpretive guidelines. In addition, the AI core group also participated in national implementation processes across several key Member States, including Italy, Spain, Slovenia and Germany.

EDRI members also actively worked on the topic of AI. **Metamorphosis**, our member in **North Macedonia**, launched the Coalition for Responsible Artificial Intelligence to foster collaboration across various sectors and ensure AI development is both innovative and responsible. This coalition involves NGOs, academic experts and business sector stakeholders.

The Association for Technology and Internet (ApTI) in **Romania** publicly notified the Data Protection Authority, and *obtained a halt on the implementation of a biometric system in a highschool in the city of Oradea*. In effect, thousands of students will now not have their faces scanned every day as they enter their establishment for mandatory education. In another project, ApTI used an AI sub-grant from EDRI to organise eight workshops for universities and for other NGOs to discuss the new provisions and implementation of the AI Act. Notably, the team was able to meet with students of Roma studies, as well as those studying Philosophy & Ethics in discussions around the use of AI in various human rights sensitive fields, including migration—a gap in current debate in Romania. Moreover, thanks to the sub-grant, ApTI managed to collaborate with organisations with which it would not otherwise be able to, such as Edumi, an NGO providing support and help for teachers from all across Romania, including disadvantaged rural areas.



Ella Jakubowska,
Head of Policy,
European Digital Rights

“Whilst in human rights terms, the AI Act is more of a gentle fizz than a big bang, we see opportunities to push for an implementation that will level up protections for people.”

**CPDP conference 2024,
Brussels, Belgium**

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Digital Rights.



With the support of the EDRI Office, **Privacy International**, submitted its opinion to the European Data Protection Board's (EDPB) consultation on training AI models and the GDPR. Based on the consultation, the Data Protection Board issued new guidelines on judging how AI companies can avoid breaching the GDPR. Privacy International urged the EDPB to take a firm approach to ensure people's rights are not undermined by AI, and received *media interest as a result*. The EDRI Office also conducted direct advocacy towards the EDPB, further urging regulators to uphold data protection rights when it comes to the use of AI.

In **Slovenia**, EDRI member **Danes Je Nov Dan** (DJND) focused on awareness-raising and AI literacy because even though the rapid rise of AI technologies is transforming society, the understanding of the impact of this transformation is alarmingly low in Slovenia. DJND *hosted workshops* for 54 Slovenian CSOs to demystify AI and its societal implications, earning high praise and strong interest in further capacity-building on AI topics.

Additionally, DJND also developed *Razkrinkaj.ai* (Expose.ai), a gamified educational tool to help people better understand AI-generated content. The quiz engages users in recognising synthetic faces, evaluating environmental images, and spotting traits of AI-generated text. It also explains how generative AI works and the risks involved. A survey among users of the tool revealed that 82% gained new

knowledge, 76% plan to be more vigilant about generative AI, and 49% admitted to being deceived by it in the past. DJND's efforts contributed significantly to raising AI literacy and awareness in Slovenia, and in empowering individuals to responsibly navigate AI's growing influence.

EDRI celebrated the fact that the final AI Act includes in-principle bans on several biometric mass surveillance practices, whilst also criticising these bans for being full of loopholes. In a moment of great validation for our efforts to advocate for a world free of biometric mass surveillance, EDRI and the *Reclaim Your Face* campaign were recognised as *European civil society AI Policy Leaders*. This honour is a recognition of the years of ground-breaking work done by the coalition —over 110 organisations across 25 EU countries, hundreds of volunteers and many actions undertaken by hundreds of thousands of supporters all over Europe.

In this context, the fight against being treated like walking barcodes is far from over. With renewed momentum, EDRI members continued to work on resisting biometric mass surveillance, along with several other deeply harmful AI practices that the AI Act has outlawed, at least in part, since February 2025.

In the meantime, **La Quadrature du Net** tackled predictive policing in **France**. Confronted with the lack of up-to-date information and real public debate about predictive policing

systems that have been used since 2017, the French EDRI member undertook extensive investigation and study. Their findings made it evident that these systems lead to an automation of social injustice and police violence, further dehumanising the relationship between the police and citizens. In light of their findings, they are advocating for an urgent ban.

La Quadrature's work on predictive policing technology is part of a *larger campaign* they launched in May 2024 to denounce the use of algorithmic surveillance by law enforcement, which started after *France became the first European country to legalise biometric surveillance in 2023*. With the *"Pas de VSA dans ma ville"* (No Surveillance in my City) campaign, the French EDRI member was able to mobilise popular opposition to algorithmic surveillance, with residents of more than 40 cities calling on their mayors to resist the installation of surveillance technology devices. This use case also became a central point of advocacy in the AI Act, with the European Parliament arguing that such uses should be banned.

The Open Rights Group formed and led a coalition in the United Kingdom to *limit the deployment of AI in policing* and counter-terrorism, even as police forces are increasingly leveraging it for the goal of predictive policing. Similarly, the Justice Committee of the Irish Parliament highlighted significant issues with the proposed police facial recognition technology bill thanks to the **Irish Council of Civil Liberties** (ICCL) and partners raising these concerns.

In the Netherlands, Bits of Freedom held the city of Amsterdam accountable for profiling and surveilling children through the so-called Top400 programme (now called 'Safe Alternative'). The programme, aimed at keeping children from committing 'serious crimes', was a way for the state to constantly monitor 'selected' children. Bits of Freedom were concerned about the way children were selected (by an algorithm) and the severe consequences of that selection, namely intrusive and long-term surveillance.

Although the city had stopped using the algorithm in question, the 125 young people who were selected by the algorithm and who, together with their families, faced the effects of this surveillance never received any acknowledgement of the unfair actions, apologies, or compensation from the municipality. EDRI's Dutch member intervened and, represented by pro-bono lawyers, started a dialogue with the city of Amsterdam to secure compensation and an apology for the affected families, and to prevent municipalities from using unfair algorithms to profile young people in the future.

Thanks to the efforts of EDRI's Dutch member, the use of the algorithm has since been halted and they are now working on the 125 young people selected by the algorithm to be compensated. The organisation also started a dialogue with the city of Amsterdam, represented by pro-bono lawyers, to prevent municipalities from using unfair algorithms to profile young people in the future.

EDRI member **Državljan D/Citizen D** saw positive developments in its *effort to map municipal surveillance* cameras in Ljubljana, **Slovenia**. After a long legal battle between municipal authorities and the Slovenian State Data Protection Authority, Citizen D managed to secure access to geo-location and brand information associated with the city's public CCTV camera installations, while simultaneously prompting an evaluation of their effectiveness in crime prevention.

In its final version, the AI Act set a dangerous precedent for the use of **surveillance technology against migrants**, people on the move and marginalised groups. The **#ProtectNotSurveil coalition** put out *a statement about the dangerous precedent* that this sets for everyone's fundamental rights. The work of the coalition inspired the **Open Rights Group** to set up their own coalition in the UK, which convenes migrant rights groups and social justice, criminal justice & digital rights organisations to challenge the roll-out of AI in immigration and national security.

DIGITAL IDENTITY AND EXCLUSION

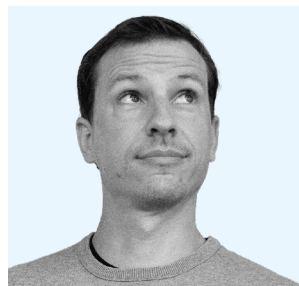
With support from the EDRi Office and several members of the network, Austrian member **epicenter.works** continued to lead European advocacy on the EU's eIDAS 2 Regulation. In particular, epicenter.works focused on the tangled web of purportedly technical rules aimed at guiding how countries implement the new law (the "implementing acts")—but which were in fact *smuggling in a dangerous watering down* of privacy and data protection rules.

In October 2024, member **La Quadrature du Net**, together with a diverse civil society coalition, *took the family branch of the French welfare system (Caisses d'Allocations Familiales, or CAF) to court* over the algorithm they use to score beneficiaries. They challenged the system on the basis of personal data protection and the principle of non-discrimination. This legal action against a social scoring algorithm used by a public authority is a first in France, and elevated the subject into the public arena.

German member **Digitalcourage** launched a petition calling for authorities to enshrine a right to live a life without digital coercion. This campaign responds to the growing trend of public and essential services forcing people to use apps—a trend that can be particularly harmful for those already subjected to social exclusion, as well as those who want to exercise their rights to be free from the pervasive digital tracking that these apps entail.

Digitale Gesellschaft Switzerland lobbied against the roll out of *the Swiss digital ID*.

The EDRi Office also started to connect the work of EDRi members and partners around the topic of digital exclusion and the surveillance of poverty. Inspired by the work of many members mentioned in this section, EDRi began collaborating with organisations such as Lire et Écrire, SOLIDAR, the European Anti-Poverty Network (EAPN), Amnesty International and others specialised in social exclusion. The group documented how the forced march towards the ubiquitous digital life comes with multiple negative impacts, especially on the most marginalised groups in society. As more of state administrative and welfare services move online, the autonomy, agency and rights of those already experiencing social exclusion, including people living in homelessness, undocumented persons, migrants, the elderly, people with disabilities and low-income groups are undermined. Our activities included joining campaign actions, drafting signed open letters, and co-delivered training.



Jan Penfrat,
Senior Policy Advisor,
European Digital Rights

"The European Commission must stand firm against attempts by Big Tech Corporations to delay, depress and destroy Europe's key digital laws. The digital rights community stands ready to help hold them to account."

2.3.

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. EDRi works to tackle the toxic surveillance-based business models and ensure that people have control over their digital life.



PLATFORM REGULATION (DSA, DMA)

The focus of EDRI's platform work in 2024 was *monitoring the enforcement* of the Digital Services Act (DSA) and the Digital Markets Act (DMA). We also kept a close eye on the deliberate circumvention of these laws by major tech companies, sounding the alarm when we saw risks or evidence of abuse or non-compliance.

Our biggest win in this area of work came in June 2024: after *a complaint* by EDRI, along with members Gesellschaft für Freiheitsrechte (GFF) and Bits of Freedom, and partner Global Witness, *LinkedIn stopped its practice of allowing advertisers to target adverts based on sensitive personal data such as sexuality, political opinions and race. We provided evidence to the European Commission that these practices violated the provisions of the DSA*. Following our complaint, the European Commission's enforcement team sent a formal request for information to the platform, which if not sufficiently rectified by LinkedIn, could have led to formal infringement proceedings.

This was a good first test case for DSA enforcement, with a direct impact on invasive data-driven ads. However, it still falls short of the kind of systematic global change we need to see to curb surveillance ads. EDRI has also been leading a complaint group of a dozen active NGOs from within and outside the network, and is scoping potential avenues for new complaints.

Another success was *EDRI's recommendation on trusted flagger designation being taken forward by a key national authority*, Arcom, as part of DSA enforcement.

EDRI led the creation of a first version of a database of Digital Services Coordinators—the institutions competent to oversee the DSA enforcement at the national level. The database is aimed at civil society organisations (wiki-based to enable contributions and with a login-accessed "internal" section), and provides vital data for the future DSA-enforcement work of civil society.

The **DSA Civil Society Coordination Group**, which includes EDRI members Access Now, Algorithm Watch, ECNL and others, coordinated and published a *joint civil society statement* with demands for meaningful transparency of DSA risk assessments.

In **Romania**, **EDRI member ApTI** played an active role in discussions between the

Romanian Digital Service Coordinator (ANCOM) and representatives of civil society and media in the context of national DSA implementations and the two rounds of the Romanian elections. Later in the year, in December 2024, ApTI leapt into action after the shocking win of an extremist candidate in the first round of the presidential elections, catalysed by TikTok mismanagement of electoral systemic risks. Together with 20 CSOs in Romania, ApTI rang the alarm about the tech giant fully ignoring its obligations under the DSA and breaching national, as well as European, election laws. They appealed to the European Commission and ANCOM for a swift reaction and investigations. Since then, the Commission has opened formal proceedings against TikTok for a suspected breach of the DSA, and the Constitutional Court of Romania annulled the first round of presidential elections based on the breach of the democratic electoral process.

The protection and strong enforcement of **users' rights** under the DSA was a common theme in much of the EDRI network's initiatives in 2024. **Gesellschaft für Freiheitsrechte (GFF)** launched the Center for User Rights, a new project focused on protecting users and fighting for tech companies to respect fundamental rights.

Similarly, EDRI member **Bits of Freedom** kicked off *"Stay Loud"*, a DSA user-rights campaign in the **Netherlands**. Through this, they raised awareness among users, especially politically-engaged young people, about Europe's new platform rules and how they can defend their rights on Big Tech platforms. This campaign included a website and *a manifesto* that was signed by 19 civil society organisations, as well as activists and journalists. The campaign featured widely on local news websites, and was present at activist locations across the Netherlands through distributed flyers. All the work in 2024 was merely the start of a multi-year campaign that Bits of Freedom will pursue to mobilise users against Big Tech, sway public opinion and make civil society more resilient.

In **Poland**, **Panoptykon Foundation** *secured a win* against Meta in the long-running case of the tech giant blocking the Facebook accounts and groups of SIN, the Civil Society Drug Policy Initiative, back in 2018. Panoptykon Foundation has supported SIN in the lawsuit since 2019. In early 2024, in a landmark moment for the country and censored users, a Polish court ruled that platforms like Meta cannot block

users at will. Moreover, the court also confirmed that banned users have the right to sue platforms in their own countries after Meta questioned the Polish court's jurisdiction.

Another element of EDRI's DSA-related work that shone through last year is related to age verification tools and their dangers. *EDRI, along with partners and allies, spoke out about the risks* to privacy, data protection and free expression entailed by the growing use of age verification tools. Many platforms have been turning to these often disproportionately intrusive and ineffective technologies in an attempt to show their compliance with the DSA. We highlighted this in *our submission to the DSA's autumn consultation on the protection of minors online*—calling on decision-makers to prioritise empowerment over exclusion. This workstream was bolstered by the official launch of the EDRI age verification working group, which has collectively initiated strong engagement with EU decision-makers to try to nuance debates around age verification.

To hold Big Tech companies accountable, EDRI and partners *submitted a comprehensive analysis* to the European Commission on the **shortcomings of Apple's compliance with the DMA**, some of which was included by the Commission in their investigation.

In November, EDRI member **ARTICLE 19** hosted its *second annual DMA symposium*. This event brought together leading academics, representatives of the European Commission, technologists and other key stakeholders to mull over what the implementation of the DMA looks like in practice, how its enforcement can be improved, and who it serves. This forum also aims to ensure that the topic of market power is taken into greater consideration by civil society in determining how to counter the prevailing and growing power of Big Tech over all our lives.

In October 2024, the European Commission unveiled its highly anticipated *Digital Fairness Fitness Check report*, which is likely to have a major influence on the planned Digital Fairness Act (DFA) proposal. This law will aim to better protect consumers from deceptive design practices, social media addiction, and pervasive online tracking. Given the huge impact this will have on our digital rights, several EDRI members kicked off their work in this area, including **Privacy International** and **SUPERRR Lab**.

SUPERRR Lab launched the *Digital Fairness and Consumer Protection Forum*, which examines the most pressing challenges and solutions needed to ensure consumer protection is fit for the digital age and meets the needs of a diverse society. Ahead of the Digital Fairness Act at the EU level, this space is helping to shape the debate on designing consumer protection in a just and future-proof way. It also fills important gaps by doing so from power-critical and feminist perspectives. An important milestone for this forum in 2024 was the publication of their *policy paper on Digital Fairness*.

The EU's digital and platform rules also have an extraterritorial impact—good and bad—thanks to the "Brussels effect" and the globalising nature of digital platforms. The EDRI network is cognisant of this and our members work to bring more attention to this aspect of the EU laws' impact.

Electronic Frontier Foundation (EFF) has been working with the *DSA Human Rights Alliance*, which consists of digital and human rights advocacy organisations representing diverse communities across the globe. These groups came together around the central tenet that the DSA must adopt a human rights-based approach to platform governance and that EU policymakers should consider the global impacts of legislation. In 2024, this group worked on principles for DSA enforcement that are grounded in the belief that recognising the DSA's global impact, negative and positive, is essential for fostering an enforcement of the DSA that mitigates societal risks and places public interest above all.

Similarly, **Share Foundation** published a *key study* on the effects of recently passed major EU laws—including the DSA and DMA—on **Western Balkan** countries (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia), many of whom are vying for EU membership.

Perhaps no other place is currently experiencing as severe an impact of the EU's influence and (in)action as Palestine. In light of this, **7amleh** is doing critical work through its reports and analysis on the *complicity of Big Tech platforms* in the Gaza genocide, the silencing of tech workers, and the destruction of Palestinian telecommunications infrastructure.

EDRi member Politiscope analysed the collective redress framework in Croatia as part of the *Collective Redress Database under the digIRISE project* led by the Digital Freedom Fund.

This database fills a crucial gap in the European digital rights landscape. Until now, legal practitioners, activists and affected communities have had limited access to practical, comparative information on national mechanisms for using the Representative Actions Directive (RAD) to enforce rights protected by EU laws such as the GDPR, the AI

Act, and the DSA. By offering detailed national reports, comparative legal analyses and an interactive comparison tool, the Collective Redress Database transforms complex legal frameworks into accessible, strategic resources. It complements academic and policy work while directly supporting litigation planning and advocacy efforts.

FREEDOM OF EXPRESSION AND INFORMATION

In 2024, an important step for our work on freedom of expression and information was the launch of the *Civic Journalism Coalition* by the EDRi Office together with our member, the **European Center for Not-for-Profit Law (ECNL)**, partner organisation **Lighthouse Reports**, other CSOs and investigative journalists. The goal of this coalition, focused on digital rights, surveillance and media freedom, is to instigate long-term relationships and trust between journalists and civil society, and thus increase the field capacity to be a strong watchdog of tech and society. The coalition aims to strengthen connections, share knowledge and needs, help protect journalists from surveillance, and support investigations on digital rights.

EDRi's Croatian member **Gong** conducted intensive support efforts to ensure citizens could exercise their voter rights during national elections, held in April 2024. They also *lobbied Meta* to take down untrustworthy accounts leading to disinformation during the national elections.










In North Macedonia, Metamorphosis delivered training to 50 civil society activists who work with marginalised groups on protecting people's rights in the digital world. The organisation published several studies, including on the effects and ethics of new technologies, and an analysis of e-services in the municipalities in the Republic of North Macedonia. Metamorphosis is notably concerned with the effect of disinformation and foreign influences on democratic processes; it published a paper on this topic in 2024, and provided inputs for the Global Digital Compact, a UN initiative for global governance of digital technology and AI. In addition, Metamorphosis worked to monitor the openness of local municipalities and strengthen the capacities of young girls and women in the area of cyber bullying and cyber harassment.

2.4.










PRESS MENTIONS

2785 press mentions in 2024

Selection of articles EDRi was mentioned in ↘

| | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  Digital rights groups call for more EU transparency on law enforcement data discussions |  9 women in cybersecurity you may not know but you should follow in 2024 |  The Risks of Internet Regulation. How Well-Intentioned Efforts Could Jeopardize Free Speech |
|  UE : le Parlement adopte dans la douleur un pacte migratoire controversé |  Meta's 'consent or pay' tactic must not prevail over privacy, EU rights groups warn |  De l'Europe à la France, la reconnaissance faciale à l'assaut des aéroports |
|  Hearings live blog: Fitto, Kallas, Mînzatu, Séjourné, Ribera and Virkkunen |  EU making ill judged move towards mass digital surveillance |  FSFE: Apple ist Bedrohung für freie Software – und DMA-Regelbrecher |
|  Olympics' AI Security Stokes Backlash Over Mass Surveillance |  Stakes high for European Union after arrest of Telegram co-founder |  Angriff der Wettbewerbskrieger |
|  Campaigners push Commission to publish spyware guidelines |  Big platforms' role in spreading disinformation fostering UK riots monitored by EU |  One year in, EU turning up heat in big tech fight |
|  Sky ECC : une messagerie canadienne prise des criminels |  Targeting citizens based on their political views is illegal, said EU data watchdog |  What lawmakers should ask the EU's new tech boss |
|  Greece accused me of espionage. I was helping people they'd violated |  Meta Lobbyist Turned EU Regulator Says Big Tech Rules Have Gone Too Far |  Europol's declaration against end-to-end encryption reignites debate, sparks privacy concerns |

Selection of EDRi op-eds ↘

| | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  Will the far right threaten Europe's digital future? |  Digital futures for all |  The sledgehammer approach of age verification tools won't make the internet safer |
|  Meta must stop charging for people's right to privacy |  Tech platforms must drop addictive features that harm young people |  The colonial biometric legacy at heart of new EU asylum system |
|  Will the Brussels spyware scandal finally convince the EU to act? |  Delay, depress, destroy: How tech corporations subvert the EU's new digital laws |  When law enforcement undermines our digital safety, who is looking after our interests? |

3. Our Finances

| | | |
|------|-------------|----|
| 3.1. | INCOME | 38 |
| 3.2. | EXPENDITURE | 40 |

2024 saw civil society organisations across the world responding to multiple major junctures, including the European elections and Europe awakening to geo-political tensions, shrinking civic spaces and a rapidly shifting funding landscape.

A key challenge faced by civil society organisations, including EDRI, was to secure sufficient funding to be able to keep fulfilling their mission and addressing critical issues in society in an effective and impactful way.

At EDRI, we have continued to place the emphasis on delivering quality work, on relationship-building and in-person contact with all our funders, and on a systematic enhancement of EDRI's financial resilience. We remain concerned about abrupt shifts in funding priorities and conditions, and the overall levels of funding for civil society, especially working on human rights and social and environmental justice.



EDRI's total income has consolidated at €2,148,620 in 2024.

In 2024, EDRI's income exceeded €2 million for the second time in its 20+ years history. This result was achieved in large part due to the renewals of multi-annual support grants from our valued foundation partners, such as the Ford Foundation, the MacArthur Foundation, the Adessium Foundation and the European Artificial Intelligence & Society Fund, along with the continuing support from other long-term dedicated foundation partners, including the Open Society Foundations, the Democracy & Media Foundation, Luminate & The Omidyar Group/Network, Civitates - the European Democracy Fund, Stiftung Mercator, the Network of European Foundations, the Goeie Grutten Foundation and the Mozilla Foundation.

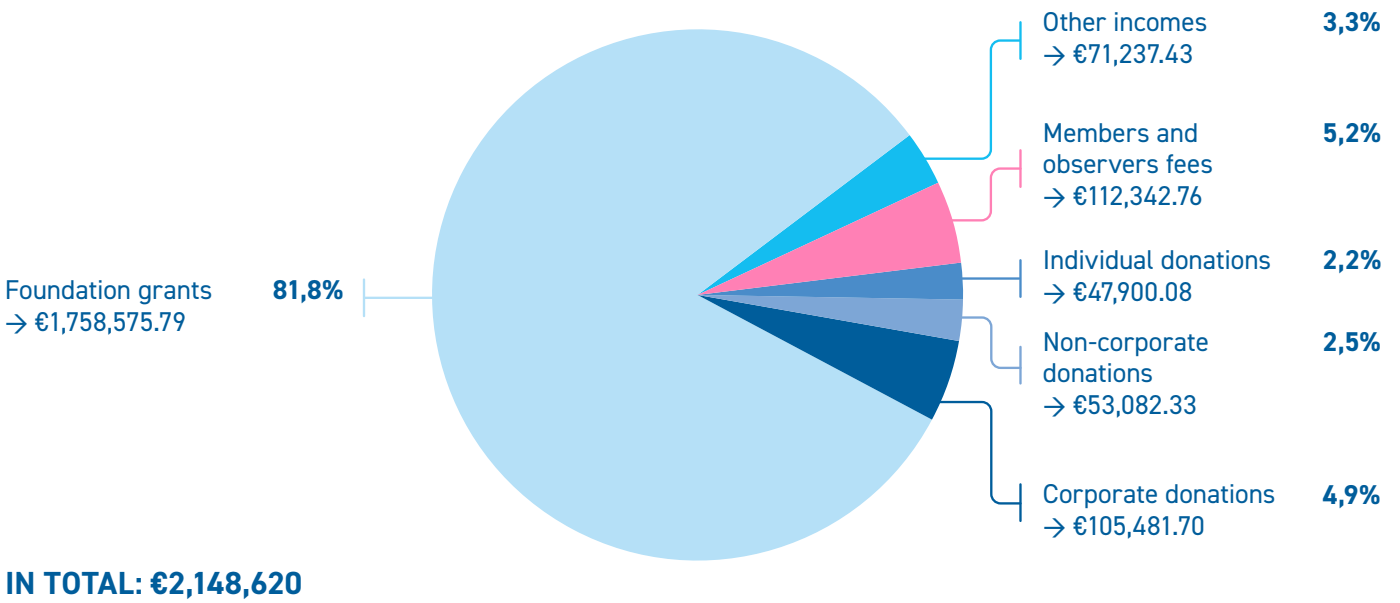
The Allianz Foundation has also joined our efforts in 2024 by providing funding for our Civic Journalism Coalition project—an initiative co-led with the European Center for Not-for-Profit Law (ECNL) and the Lighthouse Reports.

EDRI receives funding from a range of sources; however, foundation funding continues to generate the highest proportion of EDRI's income. In 2024, up to 20 foundation partners provided nearly 82% of the total annual funding to help EDRI to fulfill its mission.

Other funding sources included contributions from corporate and non-corporate donors (together just under 7.5%), annual membership fees and additional donations from the EDRI network (5.2%), and donations from our loyal individual donors (2.2%), which have been steadily rising annually.

In 2024, EDRI's leading corporate partner was the privacy-friendly search engine DuckDuckGo, with a donation of €46,500.

The corporate donations were generated to a certain extent also through sponsorship of the 12th edition of EDRI's flagship event, the 2024 Privacy Camp conference. Our profound gratitude goes to nordvpn, Surfshark, Ommm Ventures, Tech Hive Advisory, Kobler and Mojeek. The general partner and the most significant conference contributor was a non-corporate donor, the European Data Protection Supervisor (EDPS).



INCOMES 2024

| | |
|--------------------------------------------------------------|----------------------|
| MEMBERS' AND OBSERVERS' FEES | €112,342.76 |
| INDIVIDUAL DONATIONS | €47,900.08 |
| NON-CORPORATE DONATIONS | €53,082.33 |
| European Data Protection Supervisor (EDPS) | €13,900.00 |
| Wikimedia Europe | €10,000.00 |
| Amnesty International UK | €5,909.63 |
| The AI Now Institute | €4,522.70 |
| The Centre for Research on Multinational Corporations (SOMO) | €4,000.00 |
| Algorithm Watch | €4,000.00 |
| Open Future | €2,500.00 |
| Stichting Article 19 | €2,000.00 |
| COMMUNIA | €2,000.00 |
| Front Line Defenders | €2,000.00 |
| The Internet Society (ISOC) | €2,000.00 |
| Stichting Health Action International | €250.00 |
| CORPORATE DONATIONS | €105,481.70 |
| DuckDuckGo | €46,532.57 |
| Apple | €30,000.00 |
| Proton | €13,949.13 |
| nordvpn | €5,000.00 |
| Ommm Ventures | €5,000.00 |
| Surfshark | €3,500.00 |
| Tech Hive Advisory | €500.00 |
| Kobler | €500.00 |
| Mojeek | €500.00 |
| FOUNDATION GRANTS | €1,758,575.79 |
| Adessium Foundation | €232,500.00 |
| MacArthur Foundation | €226,840.37 |
| Ford Foundation | €169,254.00 |
| Network of European Foundations | €156,000.00 |
| Stiftung Mercator | €153,392.97 |
| Civitates – The European Democracy Fund | €149,000.00 |
| Luminate / The Omidyar Group | €118,240.73 |
| Open Society Foundations | €116,718.00 |
| European Artificial Intelligence & Society Fund | €116,389.81 |
| Limelight Foundation | €112,500.00 |
| Omidyar Network | €43,440.09 |
| Democracy and Media Foundation | €40,082.43 |
| Open Society Justice Initiative | €33,432.03 |
| Green Screen Catalyst Fund / Mozilla Foundation | €27,352.08 |
| AI Collaborative / The Omidyar Group | €20,000.00 |
| Digital Freedom Fund | €13,681.22 |
| Goeie Grutten Foundation | €9,100.00 |
| Mozilla Foundation | €8,927.96 |
| SHARE Foundation (SEE project) | €6,768.00 |
| Allianz Foundation | €4,956.10 |
| OTHER INCOMES | €71,237.43 |
| Other incomes | €2,561.60 |
| Sub-renting of the office and related costs | €65,605.30 |
| Employes e-lunch | €3,070.53 |
| TOTAL OPERATING INCOME | €2,148,620 |

3.2.

EXPENDITURE

In 2024, EDRi maintained its total expenditures at a level comparable to 2023, reaching €2,047,501.

In 2024, the largest part of expenditures was allocated towards advocacy work (nearly one-third), followed by campaigns and communications (just over 25%), and EDRi network development (18%).

EDRi strives to keep its human resources, finance and administrative management expenses as comprehensive and reasonable as possible (18.15%). The fundraising-related expenditures accounted for less than 6%. The EDRi team consisted of 18 full-time staff members by the end of 2024.

The diverse range of knowledge-sharing and capacity-building activities organised for the EDRi network also included a fundraising training series.

In addition to other activities, such as collaboration fostering and community building within and beyond the EDRi network, EDRi continued to provide financial support to EDRi network members through its internal grant-making scheme. The amount of provided funding increased from €53,000 in 2023 to €85,300 in 2024 and was mainly aimed at supporting advocacy work on safeguarding encryption at the national level. Nearly half of the sum was allocated to support organisations operating in Central and Eastern Europe, such as Iuridicum Remedium (Czech Republic), Panoptykon Foundation (Poland), ApTi (Romania) and Politiscope (Croatia).

EDRi remained committed to enhancing its long-term financial resilience through the establishment and upkeep of an Operating Reserve Fund and a designated Social Reserve Fund. By the end of 2024, both funds amounted to €805,000.

Following the recommendations foreseen by the Belgian law for international non-profit associations such as EDRi, as well as good practice in terms of governance and organisational sustainability, EDRi aims to secure reserve worth up to six months of operating expenses in the future. By the end of 2024, the Operating Reserve Fund was equivalent to 4.5 months of operations.

The two main events of the year included the 12th edition of EDRi's flagship event, Privacy Camp, in January, and the Tech and Society Summit in October, both taking place in Brussels. For both, event expenditures partly consisted of contributions towards the travel and accommodation of EDRi network members and activists.

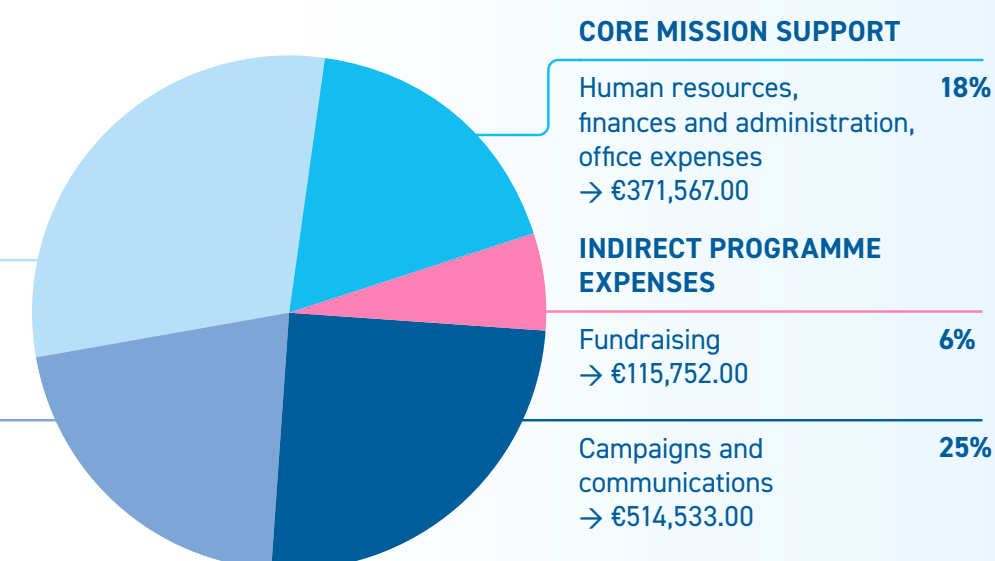
The annual General Assembly of the EDRi network took place in Heraklion, Crete (Greece), in May 2024. The three-day event, hosted by EDRi's Greek member organisation Homo Digitalis, welcomed more than 60 EDRi network representatives.

DIRECT PROGRAMME EXPENSES

Advocacy work **30%**
→ €610,046.00

Network development and governance **21%**
→ €435,603.00

IN TOTAL: €2,047,501



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.



Help us protect human rights and freedoms in the digital age through a monthly donation.

<https://edri.org/take-action/donate/>



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