
Annual Report 2025

For an inclusive
and equitable digital environment

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OPENING WORDS

By Amber Sinha, Executive Director, EDRi

2025 represented a year of transition — for European digital policymaking, and within the EDRi network. With a new college of European Commissioners, the **EU entered an era of deregulation where hard-fought digital rights protections are being diluted.** We joined forces *with over 500 groups in response*, and also reflected on this changing political reality through our new multi-annual network strategy.

EDRi took up **the shared leadership of the EU's broadest and most diverse coalition of civil society, trade unions and public interest groups from across sectors**, who have come together to respond to the ongoing and anticipated wave of drastic cuts to laws that protect labour and social rights, human rights, digital rights, and the environment, in the guise of simplification, and in the name of competitiveness. In October, EDRi hosted a two-day summit for over 100 European delegates to unify their opposition to the deregulation agenda through shared strategy and storytelling. This culminated on November 19—the launch date of the controversial Digital Omnibus—with a massive *billboard campaign across Brussels urging the EU to prioritise people's rights over the interests of Big Tech.*

These developments have coincided with a year of unprecedented external threats to EU's digital rulebook, and civil society organisations like EDRi who work towards protecting and enhancing it. Our response has been to strengthen ourselves internally. To bolster the digital rights movement, EDRi introduced **a pilot regranting mechanism designed to provide agile financial support to its network.** In 2025, 16 members received targeted grants to support high-priority advocacy and internal strengthening. In 2026, we are assessing the impact of these investments to **develop more comprehensive organisational resilience support mechanisms** for our members against external threats.

Following a year of preparation, EDRi members ratified the **EDRi Network Strategy 2025-2030** at the Paris General Assembly in May 2025, setting the network's direction for the next five years. The strategy provides a direction of travel, shared values, a vision for change, as well as a large overview of the tactics and priorities we'll

employ to achieve change. Our new strategy acknowledges the difficulty of anticipating change in uncertain times, whilst reiterating our commitment to locate digital rights in a broader social justice agenda. For the first time, our strategy includes and is marked by **an explicit adoption of a cross-cutting decolonial lens as well as a need to build greater solidarity** in the field of digital rights globally. Based on a rigorous analysis of the network, it outlines a theory of change designed for systemic impact. By addressing root causes rather than just symptoms, EDRi remains agile and responsive to a complex ecosystem of activists and decision-makers from the local to the global level.

We continue to champion the digital rulebook as essential frameworks for protecting digital rights and fair markets. This year, we took **direct legal action against Meta and X** for privacy abuses and regulatory breaches. To align our actions with our values, *EDRi permanently left X in January 2025*, shifting our focus to decentralised alternatives like Mastodon to foster a healthier digital discourse.

The network marked a significant chapter's end as it bid a grateful farewell to Executive Director (ED) Claire Fernandez, whose successful leadership guided the organisation through pivotal times. In December, I took over as the new ED, stepping into the role at a moment when the European digital rights landscape faces extreme volatility.

As the deregulation agenda looms over Europe, our team enters 2026 **well positioned to navigate the complex policy headwinds and systemic threats facing us.** We're thankful to all members of the EDRi network as well as our partners for their continued collaboration, and hope to continue working together as we resist challenges and forge a better world.

1. Our Movement

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EDRi STRATEGY 2025-2030

From January to May 2025, members and the Brussels office worked all hands on deck to drive and finalise our strategic planning process for the period 2025-2030. We undertook significant primary and secondary research and gathered feedback from EDRi members over five months, with four consecutive rounds of feedback punctuated by bilateral meetings, deep dives and drop-in sessions. In total, **75% of EDRi members and affiliates provided feedback during the drafting process.**

In May 2025, the process culminated with the adoption of EDRi Network Strategy 2025-2030 Strategy during EDRi's annual General Assembly.

The strategy has **five inter-dependent objectives:** resisting surveillance and control agendas to build a caring conception of safety; strengthening democratic accountability, expression and participation; countering the dominance of tech giants to promote public interest alternatives; cultivating a resilient and vibrant network to boost civil society solidarity; and contributing to systemic change for safe and just spaces in Europe and beyond.

For the first time in our strategy-making process, we also **plotted plausible future scenarios.** These scenarios are a reference point to compare against, as we analyse

unexpected future developments. These speculative exercises of how the future might unfold do not replace the ideal scenario EDRi articulates for advocacy and what we want our world to look like, but elaborate on possible developments over the next five years to enhance EDRi's preparedness to adapt.

During the second half of the year, EDRi's newly-adopted strategy for 2025-2030 went into effect. In practice, **this involved raising awareness about our new strategic direction towards EDRi's stakeholders (funders, partners) and catalysing reflections around what type of impact EDRi can have in a changing world.** The management team attended CSO and political forums that questioned traditional theories of change, and articulated **an EDRi plan for adapting to new theories of impact** moving forward, in line with the long term strategy.

The development of the 2026 Workplan began at the end of 2025, with **a reform of its structure that better facilitates implementation, and with mechanisms for clearer and improved alignment with EDRi's long term strategy.** Moreover, **EDRi continued its efforts to embed strategic foresight into our practice and planning** (e.g. by attending the Fundamental Rights Agenda foresight workshop in September in Vienna).

TACTICS:

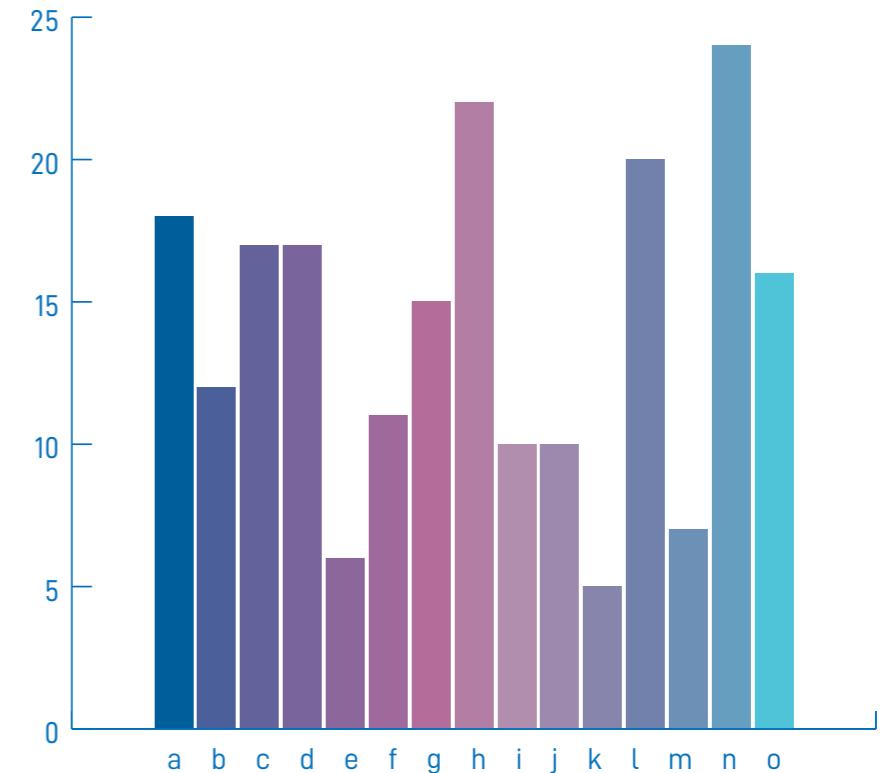


STRATEGIC OBJECTIVES 2025-2030:



Our 2025-2030 strategy aims to capture the collective impact of our dynamic network. It recognises that in some key areas, the EDRi Brussels office is leading coordination and advocacy efforts at EU level, which members wholly contribute to whilst also advancing their own agendas and priorities at national level. Some areas, such as militarisation and tackling the digitalisation of essential services, or tactics like litigation or national mobilisation efforts are led primarily by EDRi members rather than the Brussels office, all the while offering insights and learnings with our wider network.

MEMBERS' CONTRIBUTION TO THE 2025-2030 STRATEGY (AREAS OF IMPACT)



- a. Rejecting pervasive tracking and exploitation of our digital lives
- b. Labour practices, supported by technology, should empower workers and communities
- c. People have the freedom to express themselves, to communicate safely and securely, to resist oppression
- d. Communities, particularly marginalised groups, are protected and supported to seek justice for historical and ongoing harms.
- e. Our economies and societies respect the planet's health, working towards sufficiency and sustainability frameworks
- f. Public and private actors' power is checked through meaningful transparency and accountability
- g. People affected by technological harms are meaningfully engaged in digital decision-making
- h. Technology does not replace human decision-making; deployment of digital tools are limited, transparent, open to public scrutiny
- i. Universal access to digital spaces, knowledge, culture, and spaces
- j. States invest in public infrastructures and technologies, accountable and governed by democratic accountability
- k. People are freely able to access the open and free internet / digital commons
- l. People's right to data protection and privacy is upheld
- m. Consumers and interface users can confidently navigate a fair digital ecosystem
- n. Nobody is subjected to arbitrary, discriminatory or mass surveillance practices by state actors
- o. People on the move are treated with dignity and respect, not as test subjects for experimental technologies

12 AFFILIATES

(A)

Centrum Cyfrowe
 Danes je nov dan
 Digital Republic
 European Sex Workers' Rights Alliance (ESWA)
 Hungarian Civil Liberties Union (TASZ/HCLU)
 Irish Council for Civil Liberties
 Mnemonic
 Osservatorio Nessuno
 petites singularités
 Politiscope
 Privacy Network
 Zašto ne

9 OBSERVERS

(O)

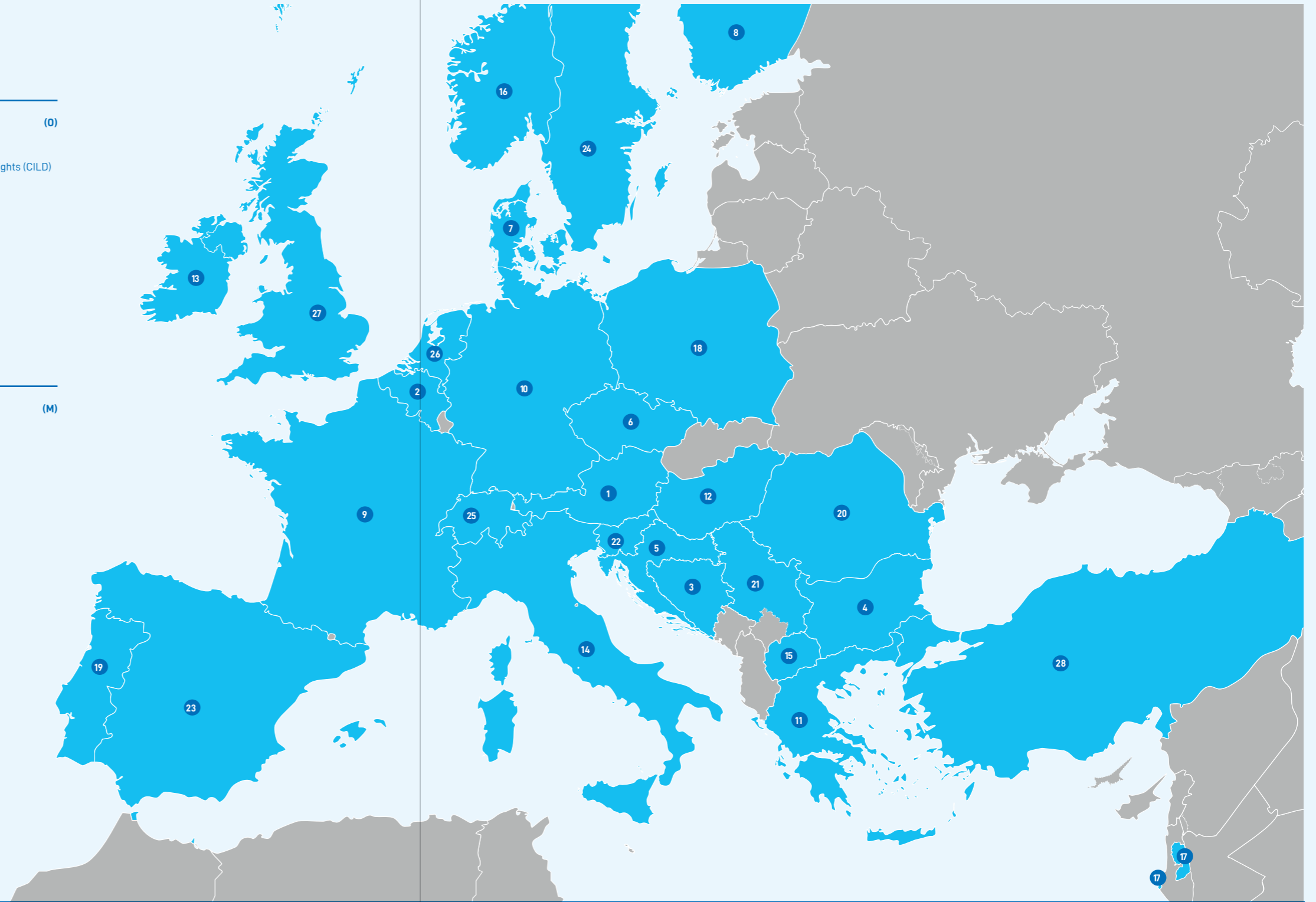
Amnesty Tech (Amnesty International)
 Italian Coalition for Civil Liberties and Rights (CILD)
 Committee to Protect Journalists
 Deutsche Vereinigung für Datenschutz
 Fédération FDN
 Pangea
 PROSA
 Reporter ohne Grenzen
 7amleh

47 MEMBERS

(M)

Access Now
 Alternatif Bilişim
 Association for Technology and Internet (ApTI)
 ARTICLE 19
 Bits of Freedom
 Chaos Computer Club
 D3 - Defesa dos Direitos Digitais
 Digital Freedom and Rights Association (DFRI)
 Digital Rights Ireland
 Digitalcourage
 Digitale Gesellschaft
 Digitale Gesellschaft Switzerland
 Državljan D
 European Center for Not-for-Profit Law (ECNL)
 Electronic Frontier Foundation (EFF)
 Electronic Frontier Finland (Effi)
 Elektronisk Forpost Norge
 Electronic Privacy Information Center (EPIC)
 epicenter.works
 Forum of Computer Scientists for Peace and Social Responsibility (FIFP)
 Foundation for Information Policy Research (FIPR)
 Free Software Foundation Europe (FSFE)
 Gesellschaft für Freiheitsrechte (GFF)

GONG
 Hermes Center
 Homo Digitalis
 Initiative für Netzfreiheit
 Internet Society - Bulgaria
 IT-Pol
 Iuridicum Remedium
 La Quadrature du Net (LQDN)
 Liga voor Mensenrechten
 Metamorphosis
 Nodo50
 European Center for Digital Rights (noyb)
 Open Future
 Open Rights Group (ORG)
 Panoptikon Foundation
 Privacy International
 Quintessenz
 SHARE Foundation
 Statewatch
 SUPERRR Lab
 vibelat
 Vrijsschrift
 Wikimedia DE



INTERNATIONAL

Amnesty Tech (Amnesty International) ^(O)
 ARTICLE 19 ^(M)
 Electronic Privacy Information Center (EPIC) ^(M)
 Mnemonic ^(A)
 Privacy International ^(M)

EUROPEAN

Access Now ^(M)
 Committee to Protect Journalists ^(O)
 European Center for Not-for-Profit Law (ECNL) ^(M)
 European Sex Workers' Rights Alliance (ESWA) ^(A)
 Free Software Foundation Europe (FSFE) ^(M)
 European Center for Digital Rights (noyb) ^(M)
 Open Future ^(M)

- Austria**
 epicenter.works ^(M)
 Initiative für Netzfreiheit ^(M)
 Quintessenz ^(M)
 vibelat ^(M)
- Belgium**
 Liga voor Mensenrechten ^(M)
 petites singularités ^(A)
- Bosnia Herzegovina**
 Zašto ne ^(A)
- Bulgaria**
 Digital Republic ^(A)
 Internet Society - Bulgaria ^(M)
- Croatia**
 Gong ^(M)
 Politiscope ^(A)

- Czech Republic**
 Iuridicum Remedium ^(M)
- Denmark**
 IT-Pol ^(M)
 PROSA ^(O)
- Finland**
 Electronic Frontier Finland (Effi) ^(M)
- France**
 Fédération FDN ^(O)
 La Quadrature du Net (LQND) ^(M)
- Germany**
 Chaos Computer Club (CCC) ^(M)
 Deutsche Vereinigung für Datenschutz ^(O)
 Digitalcourage ^(M)
 Digitale Gesellschaft ^(M)
 Social Responsibility (FIFP) ^(M)

- Greece**
 Homo Digitalis ^(M)
- Hungary**
 Hungarian Civil Liberties Union (TASZ/HCLU) ^(A)
- Ireland**
 Digital Rights Ireland ^(M)
 Irish Council for Civil Liberties ^(A)
- Italy**
 (CILD) ^(O)
 Hermes Center ^(M)
 Osservatorio Nessuno ^(A)
 Privacy Network ^(A)

- North Macedonia**
 Metamorphosis ^(M)
- Norway**
 Elektronisk Forpost Norge ^(M)
- Palestine**
 7amleh ^(O)
- Poland**
 Panoptikon Foundation ^(M)
 Centrum Cyfrowe ^(A)
- Portugal**
 D3 - Defesa dos Direitos Digitais ^(M)
- Romania**
 Association for Technology and Internet (ApTI) ^(M)

- Serbia**
 SHARE Foundation ^(M)
- Slovenia**
 Danes je nov dan ^(A)
 Državljan D ^(M)
- Spain**
 Nodo50 ^(M)
 Pangea ^(O)
- Sweden**
 Digital Freedom and Rights Association (DFRI) ^(M)
- Switzerland**
 Digitale Gesellschaft Schweiz ^(M)

- The Netherlands**
 Bits of Freedom ^(M)
 Open Future ^(M)
 Vrijsschrift ^(M)
- The United Kingdom**
 Foundation for Information Policy Research (FIPR) ^(M)
 Open Rights Group (ORG) ^(M)
 Statewatch ^(M)
- Türkiye**
 Alternatif Bilişim ^(M)

1.2.

A GROWING NETWORK

EDRi's 2025 General Assembly was hosted by our member La Quadrature du Net (LQDN). It brought together 85 participants.

EDRi General Assembly 2025,
Paris, France



By the end of the year, we welcomed three new organisations as Affiliates: **Privacy Network** and **Osservatorio Nessuno**, both in Italy; and **Zašto ne**, the first organisation of the network from Bosnia and Herzegovina. We also welcomed EDRi's former Head of Policy **Diego Naranjo** as Individual Observer, and two Affiliates who upgraded their status to full members: **SUPERRR Lab** (Germany) and **GONG** (Croatia).

As of December 2025 the EDRi network counted 60+ member, affiliate and observer organisations.

1.3.

EDRi'S BOARD

There were no changes to the composition of the EDRi Board in 2025. The terms of Jürgen Bering and Alyna Smith came to an end and both were re-elected for a second term at the 2025 General Assembly held in Paris in May.

The EDRi Board composition as of April 2026 is:

Andrej Petrovski (He/Him), *Director of Tech at the SHARE Foundation, Serbia, President*

Alyna Smith (She/Her), *Research Lead at Tech Infrastructure Coalition, Equinox Initiative for Racial Justice, Belgium, Vice-President*

Isabela Fernandes (She/Her), *Executive Director of the Tor Project, USA/Brazil, Treasurer*

Karolina Iwanska (She/Her), *Senior Legal Advisor - Digital at the European Center for Not-for-Profit Law - ECNL, the Netherlands*

Paige Collings (She/Her), *Senior Speech and Privacy Activist at the Electronic Frontier Foundation - EFF, Denmark/USA*

Jürgen Bering (He/Him), *Head of the Center for User Rights and Freedom in the Digital Age at the Gesellschaft für Freiheitsrechte - GFF, Germany*

1.4.

EDRi'S BRUSSELS STAFF

(AS OF APRIL 2026)

Amber Sinha (He/Him)
Executive Director

Katarína Bartovičová (She/Her)
Senior Fundraising Manager

Federica Lucioli (She/Her)
Fundraising Officer

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

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

Ella Jakubowska (She/Her)
Head of Policy

Chloé Berthélémy (She/Her)
Senior Policy Advisor

Jan Penfrat (He/Him)
Senior Policy Advisor

Aljosa Ajanovic Andelic (He/Him)
Policy Advisor

Blue Duangjai Tiyavorabun (They/Them)
Policy Advisor

Itxaso Domínguez de Olazábal (She/Her)
Policy Advisor

Siméon de Brouwer (He/Him)
Policy Advisor

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

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

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

Shubham Kaushik (She/They)
Senior Communications and Media Officer

Brian Donnelly (He/Him)
Campaigns Officer

Chiara Casati (She/Her)
Communications and Media Officer

Chiara Miraglia (She/Her)
Communications and Campaigns Officer

Tim Colmant (He/Him)
Graphic Design Officer

After 7 years of dedicated leadership at EDRi, Executive Director Claire Fernandez's planned departure from EDRi went ahead in June. Before Claire's departure, *Amber Sinha was appointed by EDRi's General Assembly as EDRi's new Executive Director.* The former Executive Director of the Centre of Internet and Society (India) and a long-term contributor to Tech Policy Press, Amber brings a vision that recognises Europe's role in the world, civil society's need for intersectional work and for a justice lens in EDRi's strategy.

As Amber's tenure at EDRi only started in December, the second half of 2025 saw the three members of the Management Team (Andreea Belu, Ella Jakubowska and Vanessa Buvens) leading EDRi during the transition period, with the close involvement of Senior Finance Officer Jean Duclos and EDRi Board Members Andrej Petrovski (President) and Alyna Smith. The transition period was managed deftly thanks to the hard work of the entire EDRi team and the support of our Board. The second half of the year also saw the recruitment of Policy Advisor Simeon de Brouwer, initially as temporary cover following the departure of Policy Advisor Janine Patricia Santos, but quickly transitioning into a full role. The Communications and Campaigns team welcomed Chiara Casati as a Communications and Media Officer, and the Operations team welcomed Federica Luciulli as a part-time Fundraising Officer.

In 2025, the EDRi team re-elected Chloé Berthélémy for her third term as a staff representative to the Staff Committee, and elected Brian Donnelly for the first time as a staff representative.

Despite it being a transition year, the work of making EDRi's internal policies and practices more robust continued unabated. Both the Management Team and Staff Committee remained key to EDRi's internal day-to-day management and operations. Together they contributed to co-leading and delivering organisational milestones such as EDRi's summer staff day, the annual staff retreat (in September) and various consultations (including on shared leadership models, transition progress, and needs and good practices to support staff from minoritised identities).

In addition to improving internal processes, we continued to make room for upskilling and training for teams and individual staff members. For example, colleagues in the policy team spent time with members and partners to build collective skills and capacity around enforcement techniques. Given the hostile political context, it has been strategically important to equip ourselves with the widest possible range of legal and non-legal tools available to push for positive change in creative ways.

Other colleagues completed training on facilitation techniques and accessed individual professional coaching. The EDRi Board, Management Team and colleagues responsible for finance and fundraising attended a refresher training on compliance with US-based donor foundations' requirements, whilst the Senior Finance and Administrative Officer completed a 6-week long health and safety training to ensure compliance with Belgian regulations.

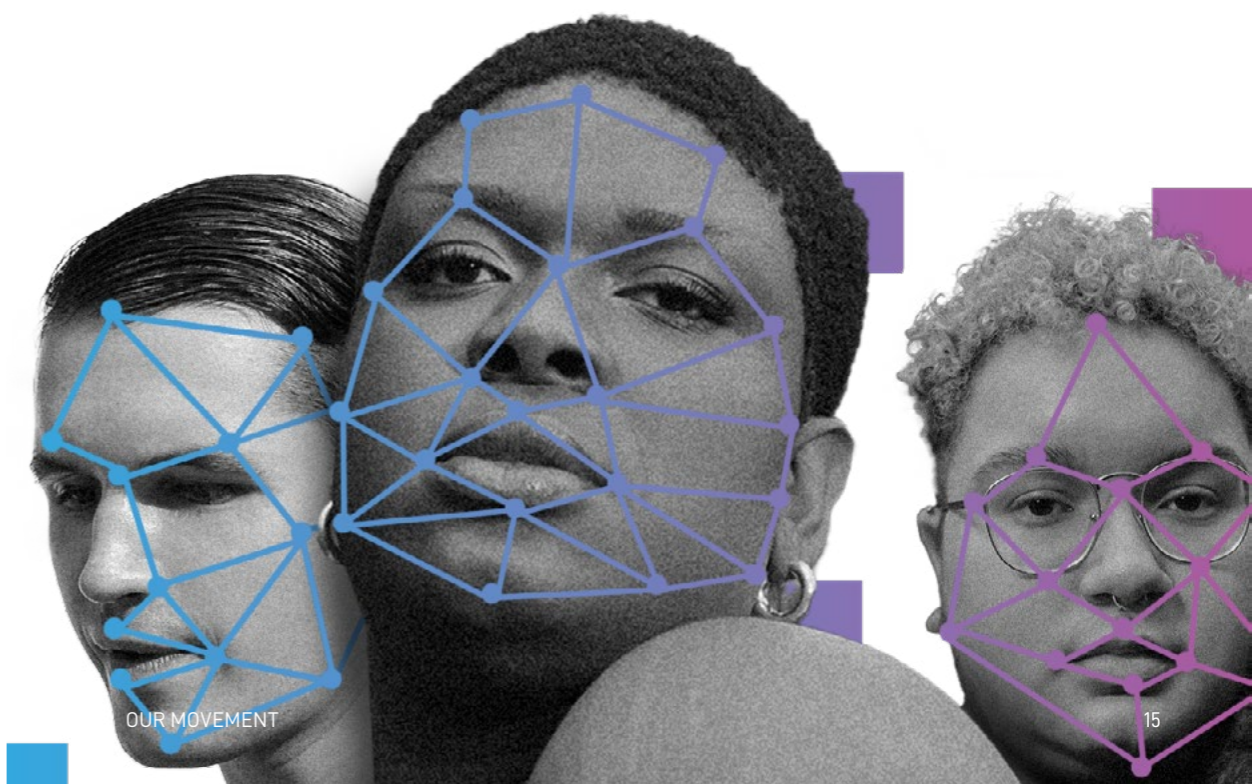
2025 marked the **launch of the pilot for EDRi's regrating mechanism.** EDRi's first committee for this mechanism was formed of three EDRi member representatives (Bits of Freedom, Wikimedia, ARTICLE 19), EDRi's Head of Membership and Community (Vanessa Buvens) and one external philanthropy expert. **The committee worked together to focus on the needs and realities of EDRi's diverse members when designing and issuing two calls for proposals.** These provided small grants to members and close partners in the areas of organisational strengthening and platform accountability. The response to the first call was overwhelming, with 14 applications received.

Under this call, **six EDRi members received grants** ranging from €6,000 to €10,000 for initiatives including organising a strategic staff retreat, providing critical stopgap funding to sustain running costs, and securing external help to support internal staff well-being and diversity efforts (see the "Our Finances" chapter for more details). In the context of the first year of Digital Services Act (DSA) and Digital Markets Act (DMA) implementation and enforcement, EDRi also **supported members' platforms accountability efforts** with a sum exceeding 100,000€. This was made possible thanks to funding from *Stiftung Mercator* and *Civitates – The European Democracy Fund* providing funding to support EDRi network and digital rights ecosystem at a time of unprecedented need. The funding was distributed among eight EDRi members: Asociatia pentru Tehnologie si Internet (ApTI), Homo Digitalis,

Mnemonic, Panoptykon, ECNL, Gong, LQDN and ORG. Towards the end of 2025, most partners reported back on how the small grants had been used and what impact they had had. Grantees overwhelmingly praised the flexibility and ease of the funding mechanism, and their feedback will inform the second edition of EDRi's regrating scheme in 2026.

In May 2025, **the network adopted new revised versions of EDRi's Code of Conduct and internal Complaint Mechanism.** July 2025 also saw the very **first edition of an EDRi Community Gathering** take place with 14 participants in Bologna, Italy. Designed to respond to the need for curated and dedicated community-building spaces as the EDRi network grows, the gathering brought together four Brussels office staff and 10 EDRi member representatives to reflect on collective care and constructive strategies for managing disagreement within our community. There were also deep listening exercises and reflections on the deteriorating external landscape and stories of resistance that can inspire and give hope to our community.

On the latter, EDRi's Board and Management Team became increasingly aware of the direct and worsening nature of threats (defamation, lawfare, targeting and/or suppression of activists voices, etc.) faced by a growing number of EDRi members. This triggered several reflections on support mechanisms for organisational protection and resilience that have fed into our planning for 2026.



In 2025, EDRI's landmark conference took place on 30 September in Brussels. This marked the first edition in which the event took place in the autumn, transitioning away from its usual organisation in January. To help fill the gap, in May we co-organised the **Digital Rights Lounge**, a side-event to the CPDP conference.

The Digital Rights Lounge brought together over seventy people across academia, regulatory enforcement, civil society and activism to interrogate several key digital rights issues. This included an intersectional exploration of the EU's deregulation push, a technical examination of the General Data Protection Regulation (GDPR) Procedural Legislation, and an energising session on modes of resistance.

In September, Privacy Camp was attended by over 370 decision-makers, activists and members of academia, and streamed by 550+ people online.

The content was shaped around the topic of resilience and resistance during times of deregulation and authoritarianism. Fundamental rights in the digital sphere are under particular pressure in the name of "competitiveness" and so-called "simplification". This is manifesting as **a wave of deregulation** on some of the most important legislative wins for digital rights in the past few years (GDPR, ePrivacy Directive, AI Act and more). At the same time, as a field, we see persistent violent crackdowns on the pro-Pal-estine solidarity movement, the erosion of hard-fought rights by LGBTQI+ communities,

people on the move, and other historically minoritised communities. This is being enabled by an increasing far-right political landscape in Europe and beyond. At the same time, **techno-solutionism is reaching new highs**. Technology is often being proposed as a tool for enabling austerity measures, as well as Europe's competitiveness and militarisation.

Over the course of 9 hours, we hosted 20 panels and workshops spanning across advocacy and legislative change, narrative strategies as well as community organising and collective knowledge production.

The 13th edition of Privacy Camp and the preceding Digital Rights Lounge were organised by EDRI, in collaboration with our partners the Law, Science, Technology & Society Research Group at Vrije Universiteit Brussel, Privacy Salon, the Institute for European Studies at Université Saint-Louis – Bruxelles, the Institute of Information Law at University of Amsterdam and the Racism and Technology Center.

The European Data Protection Supervisor (EDPS) continued to be the general partner and the conference's largest contributor. Additional non-corporate support was provided by EDRI's partner organisation, the Center for AI and Digital Policy (CAIDP). We extend our sincere appreciation to NordVPN, Surfshark, Omm Ventures, Tech Hive Advisory, Kobler, and FlokiNET.



Privacy Camp 2025 was the most-attended edition of the event in 13 years.



Privacy Camp 2024, Brussels, Belgium.

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With its new mandate, the European Commission has made “simplification” a central priority. But what is presented as a push to cut red tape is, in reality, shaping up to be a sweeping deregulation drive, one that risks weakening protections across the board. The impact of this deregulatory drive on specific topics like the General Data Protection Regulation (GDPR) and artificial intelligence (AI) are also explored in later sections of this report.

Under the leadership of President von der Leyen, **the Commission is pursuing aggressive targets to reduce legislation.** This approach prioritises the volume of rules over their quality, increasingly assessing laws on how easy they are for corporations to comply with, rather than on how effectively they protect people and the planet.

To fast-track this agenda, new legislative shortcuts, such as the “Omnibus” format, which **limit democratic scrutiny and sideline civil society, are being introduced.** At the same time, they grant industry actors greater influence over decision-making, combined with systematic deprioritisation of the public interest.

This transformation is unfolding within a **broader political context marked by a shift towards the right in the European Parliament.** As protections for fundamental rights and the environment are rolled back, surveillance and punitive social measures are simultaneously on the rise.

These developments catalysed broad mobilisation: **470 civil society organisations, trade unions, and public interest groups signed a joint letter warning against sweeping cuts to laws** protecting labour rights, human rights, digital rights, and the environment.

Digital policy is not exempt from this deregulatory drive. During its previous term, the EU established a globally-recognised framework to regulate the digital space, including landmark laws such as the Digital Service Act (DSA), Digital Market Act (DMA) and the Artificial Intelligence (AI) Act. Alongside the GDPR and other privacy protections, these measures were designed to safeguard users, increase accountability, and re-balance power between individuals and tech companies. Yet,

many of these laws are still in the early stages of implementation and need further work to strengthen and improve them. **Instead of giving them the time and the appropriate resources they need to take effect, the Commission and Member States are already pushing to weaken them,** arguing they place an excessive burden on businesses.

To resist these efforts, **EDRi mobilised from the outset,** working to steer the debate towards effective enforcement and to challenge attempts to reopen hard-won protections. Over the summer, the Commission convened a GDPR Implementation Dialogue in which *the EDRi network participated*, highlighting the critical importance of the legislation and opposing further attempts to dilute its protections under the banner of “simplification.”

Following a leak of the draft Digital Omnibus, **EDRi mobilised over 130 organisations to urge the Commission to halt any attempts to reopen core protections,** including in the GDPR, the ePrivacy framework, and the AI Act. Despite this pushback, the first Digital Omnibus package was released in November 2025, with only minor improvements.

Together with dozens of EDRi members and affiliates specialised on AI, data protection and privacy issues, **we reacted swiftly to the proposed amendments, providing in-depth analysis** of the risks they pose to the protection of fundamental rights, both online and offline. We published a *press release* and were quoted in leading international media outlets like *The Guardian, El Pais, Reuters, La Tribune* and more.



Posters urging European Commission President Ursula von der Leyen to fight for Europe, not Trump-backed tech billionaires were visible all over the EU quarter in Brussels in November 2025. The poster campaign was a joint action with partners Avaaz, WeMove and People vs Big Tech around the Commission's publication of the Digital Omnibus proposals and decision on the Google illegal adtech monopoly case.

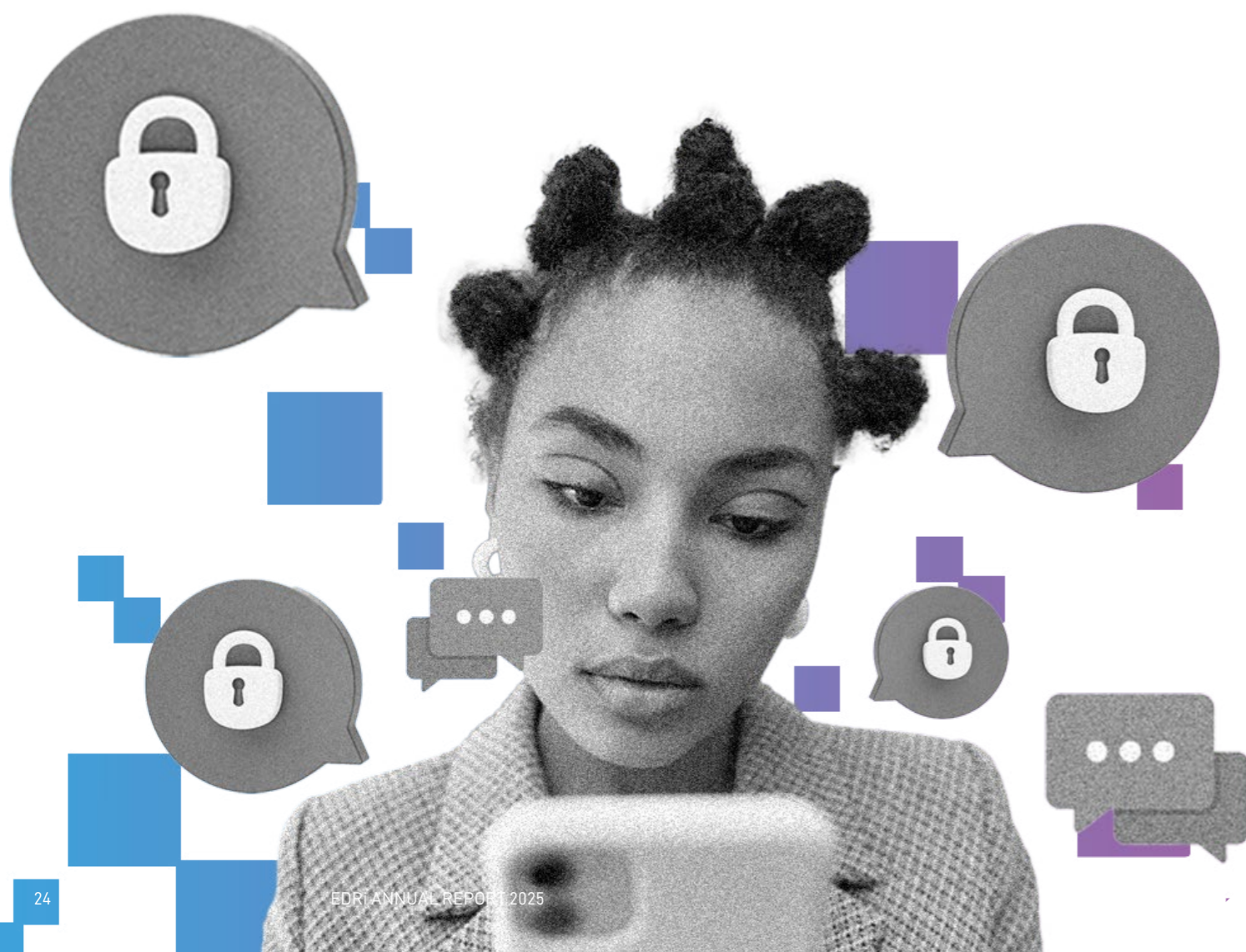


EU social and environmental activist and influencer, *Chloe Mikolajczak*, strolled through Brussels to ask people what should be steering EU's tech rules – people's interests or those of tech billionaires. This vox-populi video was a part of the Stand up Ursula campaign drawing attention to the Digital Omnibus proposals which are set to roll back crucial digital protections.

Trucks carry billboards in front of the European Commission building. They urge Ursula von der Leyen to fight for Europe, not Trump-backed tech billionaires. This was a joint action with Avaaz, WeMove and People vs Big Tech around the Commission's publication of the Digital Omnibus proposals.



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 standard safeguards against unlawful surveillance practice.



In 2025, the EDRi network **amped up our work on protecting encryption in light of the EU's new ProtectEU strategy**. We closely followed the Commission's new (and very worrying) Technology Roadmap on Encryption expert group, exercising close scrutiny and meeting several times with the officials in charge, and coordinating with the academic community to make sure that a good number of independent encryption experts applied to join the group. Building on our work in past years on the high level group on "Going Dark", on which members such as IT-Politisk Forening (IT-Pol) and individual EDRi observers have very been active along with the office, we coordinated *an open letter* from technologists to Henna Virkkunen, European Commissioner for Digital and Frontier Technologies. 39 organisations and 43 experts called for a scientific evidence-based approach to encryption and meaningful participation to safeguard cybersecurity and fundamental rights.

Whilst the ProtectEU agenda remains concerning, documents published by the **European Commission show that they may be taking a slightly more reasonable approach than with the "Going Dark" group, thanks in part to our joint advocacy as EDRi**. Other examples of our impact include personal invitations to join the new technical expert group, and speaking as one of the experts at the Danish Presidency's event for EU Member States about encryption in July 2025.

In a positive turn of events, the EDRi network and the members of our working group were key players in ensuring that the multi-year Council stalemate on Chat Control (CSA Regulation) ended with what is generally considered the least bad possible position that the Council could have taken.

In late 2025, the Council finally ruled out **mandatory mass scanning and encryption-breaking measures** in the CSA Regulation. The influence of EDRi network in making this happen is evident. Once again many members ramped up mobilisation efforts in the last quarter of 2025. Amongst others, **in Germany, Digitale Gesellschaft** and the "Chatkontrolle Stoppen" campaign launched *an urgent petition, resulting in over 363,000 signatures collected in just a few days*, demonstrating the broad concerns shared by the general public on this issue. EDRi also coordinated email outreach to Members of the European Parliament (MEPs) to provide expert advice about the CSA Regulation, capitalising on a spike in attention from the successful (independent) fightchatcontrol.eu campaign. In **Portugal**, EDRi member D3 partnered with ANSOL (National Association for Free Software) to *address an open letter* to the Minister of Justice and the Permanent Representation of Portugal to the EU, to vote against any proposal of the Council of the European Union that attacks the security of communications.

To complement our work on both the CSA Regulation and age verification, the **EDRI office met with several groups in or close to the child protection space**.



Ella Jakubowska,
Head of Policy,
European Digital Rights

"There is no single technological "silver bullet" solution to the serious problem of online CSAM. But that doesn't mean we must choose between "chat control" or nothing. We deserve structural solutions to this deeply-entrenched societal problem."

SPYWARE

Spyware remained a key issue for EDRi throughout the year. In June 2025, along with our members/affiliates IT-Pol, LQDN, SHARE Foundation, Access Now, GFF, SUPERRR, Bits of Freedom, ARTICLE 19 and Vrijdschrift, we published a [position paper calling for an EU-wide ban on spyware](#). We used this paper and ongoing advocacy to try to steer the broader civil society field towards the stronger position of a full ban rather than stop-gap measures.

We managed to keep spyware on the agenda of EU lawmakers through our relentless advocacy. The EDRi office, in close collaboration with members in the spyware working group, convinced MEPs to ask official questions to the European Commission on [spyware](#), which the Commission was obligated to answer. Following many months of intense work, December 2025 also saw our efforts paying off with the **creation of a new Parliament interest group on spyware**, which we supported.

This work also took on a **national dimension**, for example the sending of closed letters to MEPs in the Civil Liberties committee about the **Paragon scandal in Italy**, as well as the intense work of **SHARE Foundation** to contest spyware in **Serbia** even in an increasingly hostile and dangerous context of attacks from the government. Amongst other actions, **SHARE Foundation** published a book [discussing the technical, legal and social aspects of spyware](#) and reinforced the call for a global ban on this nefarious technology. The organisation also worked together with Amnesty Tech to [document and expose the use of spyware](#) against journalists and activists in Serbia.

Thanks to a small "Secure Telecommunications Regranting Fund", **EDRi was able to support the efforts of four member organisations to pursue national efforts to push back against the**

legalisation of spyware (Homo Digitalis in Greece, Iuridicum Remedium (IuRe) in Czech Republic, Digitale Gesellschaft in Germany, and epicenter.works in Austria).

In **Austria**, **epicenter.works** continued its dedicated work on the issue of national spyware, which would allow Austrian intelligence service to deploy spyware known as a "state trojan". Through multiple [statements](#), [open letters](#), and a focused campaign that [systematically analysed all contributions](#) to the legislative process, epicenter.works built a comprehensive overview of the broad criticism surrounding the proposed law. This **public pressure and political advocacy led to a significant revision of the original draft legislation**, and they also supported efforts to bring the law before the courts for a constitutional review.

In **Slovenia**, **Danes je nov dan (DJND)** launched a multi-faceted campaign against a government proposal that would have allowed the Slovene Intelligence and Security Agency (SOVA) to use invasive spyware and mass surveillance tools under the guise of "national security". By combining [a satirical online tool](#) with targeted advocacy towards lawmakers, their efforts helped **generate critical pressure needed to stop the legislation from being adopted**.

German EDRi member Digitalcourage continued their work contesting the use of spyware. The highest German court decided on two of their constitutional complaints in [a historical ruling that will significantly limit the use of state trojans](#), a government spyware. Although they were unable to achieve a complete ban on the state trojan, the decision imposed clear restrictions on its use and established regulations that must also be complied with in future legislation.



STATE SURVEILLANCE

(DATA RETENTION, STATE ACCESS TO DATA)

The EDRi network worked to contest the EU's punitive surveillance agenda. The topic of data retention saw a real resurgence due to the new ProtectEU strategy. This led to us launching a **new data retention working group**, and sending in a comprehensive submission to the Commission's public consultation on the issue. In addition to our own submission, we also prepared an answering guide for the wider public to support their input in the public consultation process. As a part of the EDRi working group on data retention, **German member Digitale Gesellschaft translated the answering guide to German**, and featured the topic in their [flagship event "Netzpölitischer Abend"](#). Their efforts mobilised more than 1000 people from Germany to participate.

Additionally, the EDRi office's information sessions on data retention laid the foundations for our fight and prompted many EDRi members to continue efforts to curb abusive practices across Europe.

In **Greece**, member **Homo Digitalis** successfully concluded a [pre-litigation project, composed of 4 reports](#), on the mass surveillance of electronic communications metadata.

Member **IuRe** continued to [campaign for substantial changes to the Act on Electronic Communications in Czech Republic](#), following their win in court earlier in the year in the data retention dispute. The Czech Supreme Court ruled that [blanket collection of metadata in Czechia is illegal](#).

In **Switzerland**, member **Digitale Gesellschaft Schweiz** led the charge with an open letter against a **Swiss Ordinance on Data Retention**, garnering broad support and media attention.

This move would have made it mandatory for communication services with more than 5000 users to retain metadata information, in particular who is in communication with whom. The Swiss EDRi member ran a [petition against the proposed ordinance, gathering more than 15,000 signatures](#), which forced the **federal council to postpone it for revision for at least a year**.

Digitale Gesellschaft Schweiz also **won big in the fight against mass surveillance by the state by suing the Swiss intelligence service over its practice of network surveillance**. The intelligence service monitors and stores traffic going across the Swiss border and since a large amount of internet traffic crosses borders, this meant mass surveillance for all Swiss people. The Federal Administrative Court ruled that the cable surveillance regime is unlawful, and the ruling was accepted by the intelligence service. The win comes with a caveat that the intelligence service has five years to comply and surveillance can continue in the mean time.

Panoptikon also managed to push back against state surveillance in **Poland**. Following the [European Court of Human Rights' judgment on Poland's state surveillance regime](#), due to a case brought by Panoptikon, the EDRi member has been pushing the government to align the surveillance regulations with the human rights standards. Thanks to their efforts, the ruling prompted the government to introduce tighter judicial scrutiny of wiretapping and the Minister of Justice preparing a draft law implementing the Court's judgment more broadly.



Aljosa Ajanovic Andelic,
Policy Advisor,
European Digital Rights

"EU public funds are fueling an industry that undermines fundamental rights, democratic institutions, and even the EU members states' own security."

In **Denmark**, **IT-Pol** opposed a *draft law that included a ban on VPNs*. **The law was withdrawn within five days**, making it a speedy success for the EDRi member and everyone in Denmark.

ESWA responded to *Sweden's decision to criminalise remote sexual services* by leading a **high-profile, Europe-wide campaign** together with Red Umbrella Sweden. The campaign included open letters, media interventions and direct engagement with lawmakers. It mobilised unprecedented support, with over 1,800 signatories including major human rights organisations, and also generated extensive *international media coverage* **challenging the narrative of consensus around the "Swedish model."**

Statewatch supported and published **research on predictive policing**, including the UK's "murder prediction" tool that was *featured widely in international media*, and reports on predictive policing in *Belgium, France, Germany and Spain*.

Lastly, member **LQDN** and the **EDRi** office reacted, including sending out a press release, to a decision on the **Terrorist Content Online Regulation (TERREG)** at the French Council of State, based on a joint 2023 complaint by **LQDN**, **Access Now**, **ARTICLE 19**, **ECNL**, **EDRi** and **Wikimedia France**. Although we strongly disagreed with the decision of the Council, our actions are a signal of our continued refusal to accept online censorship, and we used the opportunity to continue to highlight the importance of digital rights.

EDRi member **D3 – Defesa dos Direitos Digitais (D3)** was awarded the **Medal of Honour of the Portuguese Human Rights League – Civitas**. The medal aims to encourage, recognise and value the work of activists and institutions that make an outstanding contribution to promoting and advancing human rights and safeguarding human dignity. Since its foundation in 2017, D3 has been active in areas such as data retention, net neutrality and zero rating, contact-tracing apps, affordable broadband internet access, as well as copyright and the encryption wars.

CONTESTING SECURITISATION

This year, EDRi and its members' efforts to convene a broad civil society coalition to resist Europol were made visible via the **publication of a statement calling for the full rejection of the Europol Regulation**, and demanding amendments to the Facilitation Directive that would bring the legislation in line with international standards. The statement was co-drafted with Equinox Initiative For Racial Justice, initiated by members of the Protect not Surveil coalition and signed by 168 organisations and experts. The proposed Facilitators' Package would expand surveillance measures, erode the right to seek asylum and criminalise human movement.

The statement comes in the context of broader efforts from civil society to *reject the growing criminalisation of people crossing borders and those acting in solidarity with them*. EDRi's work was also mentioned/quoted 22 times in European Parliament Research Service's (EPRS) *substitute Impact Assessment* for the Europol reform.

Another highlight in this area was the *European Ombudsman ruling maladministration against the European Commission* in their preparation of the Facilitation Package, **thanks to a joint EDRi and Platform for International Cooperation on Undocumented Migrants (PICUM) complaint**.

In our work against the EU's securitisation agenda, we maintained strong access to both Parliamentarians and Commission staff. This paid off, as we were **invited to a targeted (closed) consultation on the reform of Europol's mandate**. We also worked as a **close ally of MEPs in the joint parliamentary scrutiny group on Europol**, helping them to exercise their mandate, providing them with training – and even convincing one Shadow Rapporteur (co-lead MEP) to change position to full rejection.



Chloé Berthélémy,
Senior Policy Advisor,
European Digital Rights

"Europol's expansive approach to data collection, storage and analysis creates a data black hole which fundamentally undermines people's rights and the rule of law."

EDRi member **Statewatch** continued their relentless work on **resisting surveillance and securitisation around migration**. Amongst other activities, they mobilised over 40 organisations and individuals to send *an open letter to EU officials to raise serious concerns* over a planned agreement between Europol and Egyptian law enforcement authorities. The letter opposes the agreement due to Egypt's "abysmal human rights record" and condemns the plan as part of a regional strategy that places security interests above any consideration of justice, democracy and people's rights and freedoms.

Statewatch also organised *six training workshops on data protection, immigration and asylum with over 300 participants* to help people understand how data protection law interacts with immigration and asylum proceedings. They published the *"Data Protection Handbook on Asylum and Migration in Europe"*, designed to give immigration practitioners an understanding of data protection law.

Their publications also included *research from their project "Networks of (In)security"*, which emphasised that **surveillance systems and security policies do not stop at national borders**. Rather, they form a global network of "security" that is anything but secure and, in fact, restricts rights, enables repression, and operates with little accountability. Statewatch also analysed *the newly proposed the French drugs law*, which has been dubbed **"the worst surveillance law in the EU"** and would have disproportionate impact on migrants, their supporters, and dissent in general.

In the **UK**, **ORG** published research and mobilised over 70 digital and migrants' rights organisation against the **failings of the Information Commissioner's Office in regards to the data leak of Afghan refugees and the failing eVisa scheme** which is riddled with data errors, inaccessible design, and technical failures. This leaves migrants unable to access their right to work, rent, study, travel, or access essential services.



DATA PROTECTION

As the cornerstone of the EU's digital rulebook, the GDPR continued to serve as a critical framework for safeguarding fundamental rights in the digital age. However, **under the new mandate of the European Commission, it has also come under increasing political pressure**, with calls for "simplification" raising concerns about potential deregulation and the reopening of hard-won protections. Against this backdrop, **EDRi and its network prioritised defending the integrity of the GDPR while continuing to push for its effective enforcement and evolution in response to emerging challenges.**

A major development during the reporting period was **the adoption of the GDPR Procedural Regulation**, a file that EDRi, alongside members and partners, had followed closely for several years. While some of the *network's key demands* were reflected in the final text, the outcome ultimately fell short of expectations.

In response to these challenges, EDRi significantly intensified its advocacy and agenda-setting efforts at EU level. Throughout the year, it **engaged extensively with policy-makers across institutions**, including meeting with Commissioners and their cabinets, notably on GDPR and its interaction with emerging files such as the Digital Fairness Act (DFA). These efforts were complemented by participation in high-level events and strategic forums, including European Parliament hearings and flagship events. **Together with The European Consumer Organisation (BEUC), EDRi co-hosted a Presidency-endorsed roundtable on the GDPR Procedural Regulation**, while also contributing to

parliamentary scrutiny through supporting the drafting of questions submitted by Members of the European Parliament to the Commission on issues ranging from digital trade to international data transfers.

This strong institutional engagement was paired with targeted advocacy actions, including written *submissions to the European Commission's implementation dialogues on GDPR and ePrivacy "simplification"*, as well as sustained one-on-one engagement with the Commission's Fundamental Rights units on serious issues of commercial surveillance and data exploitation. EDRi also invested in coalition-building and **collaboration with strategic partners such as BEUC** on the intersection of data protection, consumer rights, and the AI Act.

At the same time, members across the EDRi network continued to drive impactful GDPR-related work at national and international levels. **In Croatia, Politiscope played a key role in monitoring GDPR enforcement and raising public awareness of unlawful data practices**, including through a successful public pressure campaign that led the Data Protection Authority to order the removal of sensitive personal data by the City of Zagreb. **In Switzerland, Digitale Gesellschaft Schweiz mobilised public support against fraudulent advertising practices** and against the usage of personal data without consent, restricted under the GDPR. *ORG investigated the harms of Meta's "consent or pay" model* and its use of so-called "stalker ads", advocating for rights-respecting alternatives and exposing the limitations of current consent frameworks.



Itxaso Domínguez de Olazábal,
Policy Advisor,
European Digital Rights

"Fundamental rights are not an inconvenience. They are a boundary line that stops the digital economy from becoming a system of unaccountable extraction and automated exclusion."

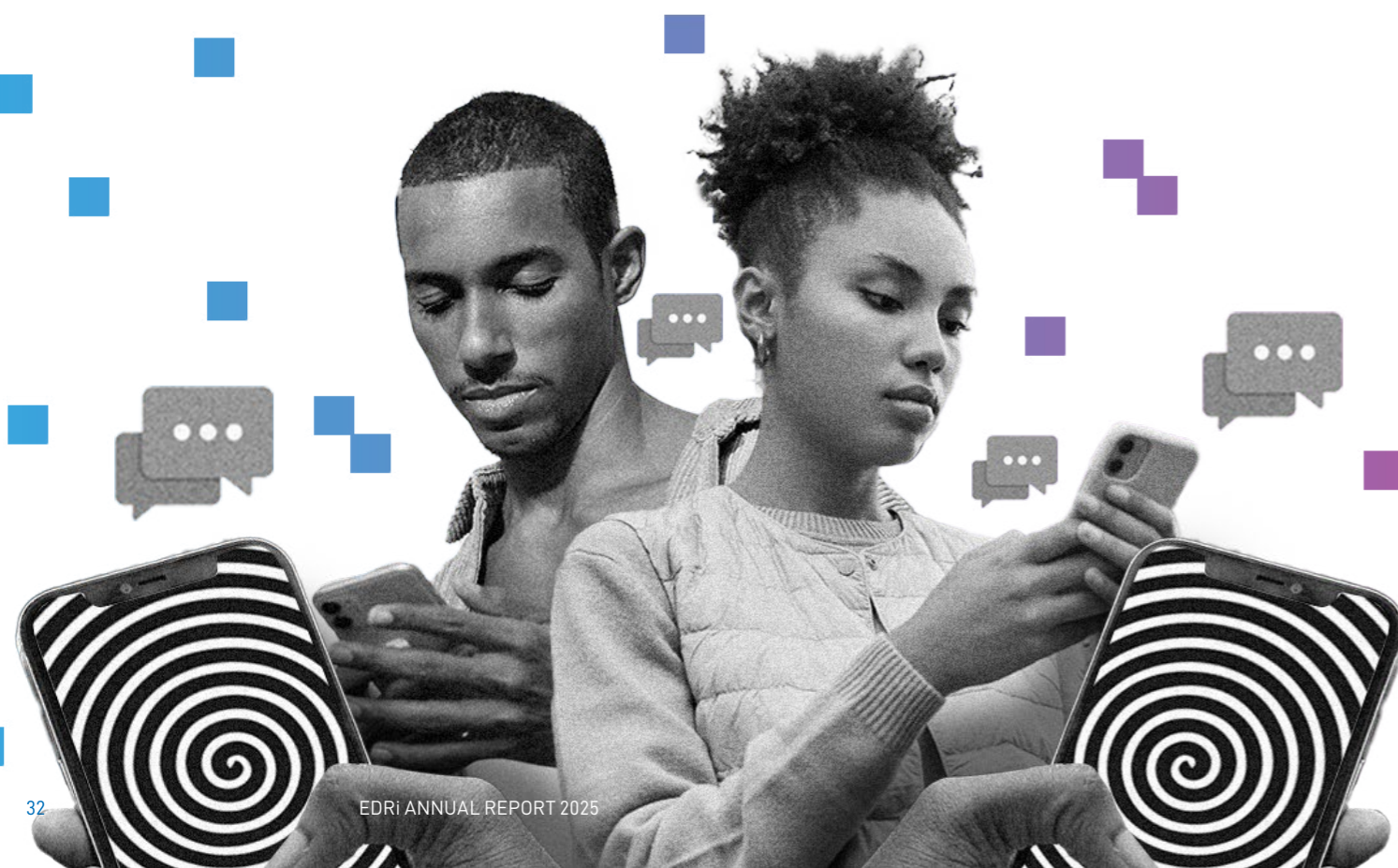


EDRi mobilised on the same topic: it **launched a targeted mini-campaign on Meta's "Pay or Okay" model** that helped raise awareness of broader data protection issues. As part of these efforts, EDRi partnered with EUMadeSimple platform resulted in a *successful video on GDPR*, generating over 100,000 views and strong audience engagement.

EDRi and its members continue to **challenge the European Commission's adequacy decision regarding EU-Israel data transfers**, while advocacy efforts successfully **encouraged some Members of the European Parliament to vote refer the EU-Singapore Digital Trade Agreement to the Court of Justice**, even though the ultimate threshold was not met to achieve this.

By combining high-level advocacy, strategic litigation, grassroots mobilisation and cross-sectoral collaboration, **the network worked, and will continue working, to ensure that the GDPR remains a foundational pillar of the EU's digital framework**, continuing to respond to mounting pressures to weaken data protection standards.

Our work on open internet and inclusive technologies is committed to ensuring that new digital technology 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 opportunity for progress. However, access to digital technology is vastly unevenly distributed, and 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.



Our work focused on following the implementation process of the EU AI Act and resisting the deregulatory wave across the bloc that did not spare even one of its youngest digital laws.

In the first half of 2025, the European Commission published its long-awaited *guidelines on prohibited AI systems under the EU AI Act*. Thanks to the extensive multi-year work of the AI core group (comprised of 20 active EDRI members and some close allies), with support from the **Protect not Surveil coalition**, our efforts paid off: throughout the 140-page document, **our recommendations were incorporated to a large extent**. As a result, **this interpretive document resolved some of our big criticisms of the final AI Act text**, such as the blanket exception for national security uses. More work is needed to strengthen the protections in the AI Act, to find alternatives to fill the remaining gaps, and to extend protections to the border and migration context, such as implementing a full ban on biometric mass surveillance. Nevertheless, **this has been an important step forward for our collective work**. EDRI was also invited to present and defend our position on the **Commission's prohibition guidelines at the European Parliament IMCO-LIBE working group on AI Act implementation**.

The **French AI Summit** in February was another key forum for our AI work, with many members and ourselves in attendance. We also collaborated with several national groups to provide a critical counter-lens to the summit. In particular, **LQDN launched the Hiatus coalition, to challenge the dominant narrative that there must be AI uptake is inevitable**, despite the human and environmental costs.

Throughout the year, the EDRI office and AI core group worked together to not only bring attention to the risks posed by deregulating AI, but to also show **the interconnectedness of AI deregulation with environmental deregulation**, which risks creating a perfect storm of abuse and harm. At the same time, **we doubled down on the implementation of the AI Act**, despite a lack of political will, meeting regularly with MEPs who negotiated the AI Act to jointly strategise on its protection.

Another highlight in our work on AI was the civil society **webinar run by the core group to help inform and equip other organisations to apply to the AI Act's Advisory Forum**. The webinar was highly-attended and very well-received. We also **submitted to the Commission's AI Act high-risk consultation**. Along with the Protect Not Surveil coalition, we developed an **answering guide** that was disseminated widely and was used by numerous partners and allies in order to highlight joint demands to the Commission.

EDRI members were active in their national contexts to ensure national adoptions of the AI Act was done to the highest possible human rights standards. In the **Republic of North Macedonia**, the **Metamorphosis Foundation established an AI Alliance** comprising civil society, tech experts and government stakeholders. This alliance serves as a technical "safe harbour", ensuring that national AI adoption aligns with EU standards while mitigating risks such as algorithmic discrimination.

In **Slovenia**, **DJND successfully campaigned for the launch of a national AI registry and increased CSO participation** in AI legislation oversight. In fact, a member of the DJND team was appointed to the interdepartmental working group responsible for preparing the National Programme for Promoting the Development and Use of Artificial Intelligence in the Republic of Slovenia.

In **Germany**, **Digitale Gesellschaft** contributed to the launch of the *Code of Conduct for Democratic AI*, specifically on the inclusion of **provisions on transparency, (non-) discrimination, environmental impact and rights of people along the entire supply chain of AI**. Meanwhile, in **Greece**, **Homo Digitalis launched the GAIN coalition**, a human rights protection network in the Development and AI Systems. The organisations involved in the GAIN network collectively cover a broad and interdisciplinary range of fields, reflecting strong civil society ecosystem oriented toward rights, inclusion, transparency, and innovation.

In **Italy**, affiliate **Privacy Network** examined the **roll-out of biometric surveillance in football stadiums**, and successfully proposed several amendments to the new AI Law (Law No.132/2025).



Blue Duangdjai Tiyavorabun,
Policy Advisor,
European Digital Rights

“The Digital Omnibus is a full-on betrayal of Europe’s promise. They are trading the protection of people from harmful AI systems for hollow promises of “innovation”. This is no shocker: when tech money flows like water in Brussels, guess who is steering the ship?”

Politiscope in **Croatia** actively lobbied for **civil society and watchdog organisations to be included in legislative processes around the AI Act** in a context where civil society are usually shut out. Although their efforts resulted in the Ombudsperson, the Data Protection Authority, and even industry representatives supporting the inclusion of civil society organisations in the working groups on AI Act implementation, their repeated formal requests to join were denied. They are continuing the work to advocate for meaningful civil society participation in legislative processes related to AI and digital technology in general.

EDRi members also continued their work on **fighting biometric mass surveillance** and other deeply harmful AI practices. Perhaps the most notable work on this issue was the **strong collaboration between the EDRi office, ECNL, Hungarian Civil Liberties Union (HCLU), and close partner Civil Liberties Union for Europe, and ILGA Europe, to contest the use of facial recognition at Budapest and Pécs pride parades.**

As part of broader efforts to challenge Hungary’s systemic violations of the rule of law, as well as the illegal criminalisation and suppression of LGBTQI+ content and communities, **we drafted a legal analysis** explaining why Hungary’s actions breach the AI Act. We used this analysis to advocate for change with the Commission and MEPs. While the Commission’s ongoing silence on this issue is deeply disappointing, the fact that the Budapest Pride march was able to take place is a significant achievement in itself. We believe that **our public pressure is crucial in highlighting the Commission’s failure to protect individuals from AI.** As the use of facial recognition is a key test case for the AI Act, **we have continued to pressure the Commission to respond.** We are also monitoring other countries where the legalisation of live remote biometric identification (RBI) under the AI Act poses a serious risk.

In **Germany**, **Chaos Computer Club (CCC)**, launched two complaints: one **against the use of Palantir’s surveillance software in Bavaria** which allows the police to “data mine” sensitive biometric data; and the other **against the federal law enforcement agency (BKA) for unlawfully sharing biometric data.**

In response to the use of **automated facial recognition by Austrian police to identify participants of a climate demonstration in Vienna**, **epicenter.works** filed a complaint with the Austrian Data Protection Authority and publicly criticised the practice as lacking a clear legal basis and posing risks to the freedom of assembly. This case also informed their advocacy on the **national implementation of the EU AI Act**, where we highlighted the need for strict safeguards and effective enforcement of the rules governing biometric identification systems.

There were also victories worth celebrating along the way. In **Ireland**, **Digital Rights Ireland** and the **Irish Council for Civil Liberties (ICCL)** were successful in securing recognition from the Data Protection Officer that the **collection and use of biometric data for Irish Public Services Card is illegal.** Even though the decision came late and did not go far enough, this was a partial win for the rights of people living in Ireland.

Following a complaint by **Homo Digitalis** in 2020, the Hellenic Data Protection Authority ruled in December 2025 that the **Hellenic Police’s Smart Policing project was unlawful.** The €4 million EUR system would have enabled facial recognition and fingerprint identification during police stops, targeting people on the move, and was halted before full-scale deployment.

In **France**, **LQDN won in Grenoble administrative court** in **a case about algorithmic surveillance.** The decision recognised the **illegality of Briefcam’s**

algorithmic video surveillance software used by the municipality of Moirans. The software in question can put algorithmic filters on CCTV footage in order to track or find people on the basis of their appearance, clothing, gender or even their face through facial recognition.

In **Czech Republic**, **luRe** fought against a proposal by the Ministry of the Interior that circumvents the rules of the AI Act. The proposal indicates including entire groups of people in biometric databases, rather than individuals, as is required by the law. Unfortunately, despite strong opposition, Czech lawmakers approved the rules. However, **luRe’s long-standing criticism of biometric surveillance contributed to the shutdown of the facial recognition system at Prague Airport.**

In another win, **luRe** filed a lawsuit in court to allow for **deletion of emails and phone numbers collected during COVID-19 vaccinations and testing.** The case concerned one individual, but **luRe** provided the public with instructions on how anyone can achieve this.

DJND recently launched **Razkrinkaj.ai – an online tool that allows users to test their ability to recognise AI-generated content** through an interactive quiz while learning about the risks and challenges associated with it. **DJND** also organised a talk with **Shir Hever**

from Boycott Divest and Sanctions (BDS) on the Israel’s use of AI-powered tech for the genocide in Palestine. This topic of the role of EU tech companies and EU funding in genocide was also raised by **Access Now** in their powerful panel at the CPDP Conference in May 2025.

SUPERRR teamed up with The Distributed AI Research Institute to host **a gathering of international data workers in Berlin in order to center the needs of those most exploited by tech in tech policy debates.** Through the event, they connected international labor rights activists with each other, which led to activists collaborating on joint projects. The event also attracted the interest of Members of Parliament and policymakers, who engaged with the workers and committed to advancing their demands.

SUPERRR also had a viral online moment: their **blog post on how the organisation uses AI was shared over 1,500 times on LinkedIn** and sparked significant discussion across civil society and policy circles. They received strong positive feedback from the European Parliament and the European Commission on their blog. Many stakeholders reported that the post helped them advocate internally for more ethical and responsible approaches to AI, expanding the realm of possibilities for how they engage with digital technologies.

DIGITAL RIGHTS x ENVIRONMENTAL JUSTICE

In 2025, EDRi launched the **Environmental Justice and Digital Rights working group.** We organised a kick-off workshop with 10 participants representing organisations working at the intersections of climate and digital justice. Thanks to this workshop, we were able to adopt **a coherent narrative** which we published on **a landing page** for our work.

At Privacy Camp 2025, we built on the work of this group to start **co-developing a factsheet that maps the impact of technology on the environment.** This is a step forward in achieving our new strategic objective to better locate our digital rights work in the broader context of the impact of tech on the environment.

Additionally, **petites singularités** organised the **Zoethical gathering** in Brussels in October 2025 as part of Congo Week. This event **raised awareness of anti-extractivist struggles from around the world** and brought together individuals working on this issue.

In **Spain**, **Pangea published resources aimed at promoting more environmentally sustainable use of internet services,** including practical guides on reducing the ecological impact of email and cloud usage.

DIGITAL IDENTITY & EXCLUSION

The topic of digital identity and exclusion came even more to the front of EDRI's work in 2025, with the **launch of a new internal working group to explore the digitalisation of public and essential services**. With this group, we started scrutinising the EU's aspiration for total digitalisation of public and essential services, including access to government benefits and services, healthcare, education, employment, housing, transport and finance. With more and more of public life going digital, we are attuned to the **risks of data protection violations, the loss of the right to analogue, and an amplification of structural exclusion against discriminated-against or disenfranchised communities**.

Towards the end of 2025, we initiated consultations with over 15 civil society organisations, working closely with the European Anti-Poverty Network (EAPN) and EDRI member LQDN, with the intention to step up this area of work and opportunities for joint action in 2026.

epicenter.works played a key role in shaping the debate around the **EU Digital Identity Wallet**. Through *in-depth policy analysis*, advocacy, and engagement with decision-makers, they highlighted critical risks related to privacy, security, and the **potential for over-identification in digital environments**. Their work contributed to a more fundamental rights-oriented discussion on the design of digital identity systems and *held decision-makers accountable*.

At the same time, they **strengthened the capacity of civil society organisations to engage with digital policy challenges**. Through trainings, *e-learning*, and direct engagement, including workshops with NGOs in Uganda, epicenter.works helped build a more connected and resilient network of digital rights defenders equipped to address evolving issues around digital identity and beyond.

In the Netherlands, Bits of Freedom contributed to the *Municipality of Amsterdam stopping their 'Amsterdam Top 400' program*, which was an **invasive municipality project using predictive policing**. It led to unwanted interference in the private lives of young people. Together with a coalition of professionals from different background and affected individuals, they explored the possibility of holding the municipality of Amsterdam accountable for violations of children's rights, data protection law, and fundamental freedoms.

In France, LQDN stepped up their work on *documenting the algorithmic harms caused by AI in the French welfare system*. They especially looked into France Travail, the French governmental agency which registers unemployed people and offers aid and support, which is automating and extending control over people registered for unemployment benefits. LQDN also continued to *expose the unlawful and discriminatory scoring algorithms used by the French governmental services*, and the flow of data between the administration and law enforcement.

In the UK, ORG published *research* that found that the **Home Office's digital-only immigration status system is leaving migrants in the UK stressed, confused and fearful**. It is especially affecting people with limited digital literacy, language barriers and disabilities.

2.4.

INFORMATION DEMOCRACY

From enabling surveillance to accommodating authoritarian demands, major platforms have shown a willingness to prioritise influence and profit over safeguarding people's rights. This convergence fuels repression, distorts public discourse and weakens democratic systems. EDRI works to expose and challenge these dynamics, pushing for a digital environment where power is accountable and rights are non-negotiable.



PLATFORM REGULATION

In 2025, EDRi and its network made significant strides in advancing transparency, accountability and enforcement under the DSA, while continuing to challenge the broader systemic harms caused by dominant online platforms. A key milestone in this effort was **the launch of the Digital Services Coordinator (DSC) database**, developed by the EDRi office with the support of members and partners. This resource tracks investigations into platforms' compliance with the DSA and represents an important step towards greater transparency in enforcement.

This work was closely connected to a **growing number of successful enforcement actions and litigation efforts across the network**. At EU level, **a complaint led by the EDRi together with member ApTI** resulted in *X bringing its Trusted Flagger processes into compliance with the DSA*, after investigations revealed systemic breaches in all tested languages except English, where users were misdirected to a non-functional reporting form. In parallel, **EDRi and member GFF** *challenged Meta's harmful profiling practices*, underlining the network's commitment to robust enforcement of the DSA's protections.

Strategic litigation also proved impactful at national level: in the Netherlands, *Bits of Freedom secured a landmark court ruling against Meta*, **affirming users' freedom of choice and exposing the company's failure to comply with its DSA obligations**.

In the UK, *ORG supported Tanya O'Carroll in a successful case against Meta*, which helped reinvigorate public debate around the "Right to Object", the tabling of a Parliamentary motion on the subject and the protection of personal data. These efforts were complemented by campaigning action, online and offline. ORG staged a protest outside Meta's offices and launched a series of awareness raising actions, including the launch of an "opt-out" tool designed to **help users opt-out of targeted adverts on Meta's platform**.

Collective action and knowledge-sharing were further strengthened through **EDRi's complaints working group**, which brought together over a dozen members and partners to exchange early lessons, coordinate strategies and lay the groundwork for joint complaints addressing issues such as discriminatory content moderation. This collaborative approach was complemented by internal strategising aimed at expanding the DSA

complaints ecosystem, with a particular **focus on involving communities most directly affected by platform abuses** by working together to identify key issues and gather evidence jointly. At the same time, allied initiatives such as the *DSA Human Rights Alliance*, led by *Electric Frontier Foundation (EFF)* and *Access Now*, reinforced cross-organisational coordination on enforcement and fundamental rights.

Across the network, members continued to explore and expand the scope of the DSA through research, advocacy and litigation. Several organisations focused on the intersection of platform governance and democratic processes: **Gong and ApTI examined the application of the DSA to electoral integrity and broader civic discourse**, including the persistence of harmful misinformation even after debunking. Others addressed systemic risks linked to discrimination and marginalisation. **LQDN conducted research and interviews on national DSA implementation**, including discriminatory advertising practices, while *ESWA produced evidence-based recommendations on content moderation and adult advertising platforms*, highlighting issues such as shadowbanning and lack of effective redress. These findings fed into broader advocacy efforts, including *an open letter to Meta's Oversight Board* supported by over 70 signatories.

The network also remained **deeply engaged with the global human rights implications of disproportionate platform power**. **SHARE Foundation** published *analysis on platform regulation in the EU and Western Balkans*, while **Metamorphosis Foundation** played a key role in *aligning national legislation with EU standards in North Macedonia*, including through policy advocacy, public education and its leadership in the *Anti-Disinformation Network for the Balkans*.

At the same time, members explored **how the DSA framework resonates beyond the EU**. **Mnemonic** continued its critical work documenting human rights violations facilitated by platforms in conflict settings, including Syria, Ukraine and Palestine, while *Tamleh contributed expertise on the relationship between platform governance and the amplification of harmful content during the genocide in Gaza*.

National-level advocacy also demonstrated the DSA's influence in shaping legislative debates. In Poland, **Panoptykon's critique of**

draft DSA implementation measures sparked a nationwide debate on online censorship and ultimately led to the suspension and redrafting of the proposal.

Complementing this work, EDRi and its network also intensified efforts to **leverage the DMA to drive change in digital markets**. This included coordinated advocacy at EU level, such as a joint (non-public) **letter addressed to Executive Vice-Presidents of the European Commission Teresa Ribera and Henna Virkkunen**, co-signed with nine other organisations, raising concerns and priorities around DMA enforcement. The network also gained strong visibility during the **European Commission's public DMA workshops with designated gatekeepers in May**, using this key forum to call out harmful practices and contribute civil society perspectives on enforcement priorities. These efforts took place against a backdrop of increasing political pressure on EU platform regulation, including external attacks from the United States and a broader backlash against enforcement advocates, further underscoring the importance of sustained, coordinated action.

Together with members ARTICLE 19, Free Software Foundation Europe (FSFE), GFF, Homo Digitalis and Vrijschrift, EDRi submitted a formal contribution under Article 27 of the *DMA raising concerns about Alphabet's (Google's) compliance*. Later in the year, EDRi was invited to participate in the **European Commission's closed-door DMA high-level group**, where it brought forward key insights on enforcement challenges and potential solutions.

Members also played a central role in advancing DMA-related work. **ARTICLE 19 contributed extensively** through *research* and policy engagement, including the participation in high-level roundtables and publication of *an op-ed on the subject*. **ARTICLE 19 filed a complaint against Apple** for impeding end users to install software, as well as switching and subscribing to different application.

With the Digital Fairness Act expected to be launched in 2026, EDRi and its members worked on its influencing, recognising the opportunity of having a future-proof legislation that could modernise consumer protection in

the digital age. To this end, *EDRi contributed to the consultations opened by the European Commission*, urging it to tackle deeply harmful forms of manipulation, which undermine people's fundamental rights to privacy, data protection, autonomy and equality.

SUPERRR advanced **interdisciplinary engagement on digital fairness**, convening a range of activities under its *Forum for Digital Fairness and Consumer Protection*. This included a Digital Fairness Spring Fair bringing together civil society, policymakers and creatives, as well as a three-part online event series exploring structural challenges such as digital advertising, commercial surveillance and discrimination. Their *concluding event* helped reframe **digital consumer protection as a matter of justice, self-determination and the creation of a digital public sphere that serves all**.

Within the EDRi office, this work was complemented by the activities of the commercial surveillance working group and related advocacy efforts, further strengthening the network's capacity to address the **intersection of market power, data exploitation and fundamental rights**. Together, these initiatives reflect a growing recognition that effective **platform regulation requires a holistic approach, one that bridges competition law, consumer protection and human rights**.

Taken together, these efforts highlight the **wide-reaching impact of EDRi's collective work on platform accountability**. By combining strategic litigation, coordinated complaints, evidence-based advocacy and cross-border collaboration, **the network is ensuring more effective enforcement of the DSA and DMA, as well as shaping the future adoption of the DFA**, in the protection of people's rights online. At a time when the influence of Big Tech on democratic processes, public discourse and fundamental rights has never been more evident, this work is essential to building a digital environment that is more transparent, equitable and firmly grounded in human rights.



Jan Penfrat,
Senior Policy Advisor,
European Digital Rights

“If the EU is serious about digital self-determination, we must strengthen our laws now and make sure they protect every part of the tech stack and every corner of the digital industry against gatekeeper power and monopolisation.”

AGE VERIFICATION

In 2025, we have witnessed a series of rapid and deeply concerning policy developments related to age verification, one of the most prominent and contested digital policy issues in Europe and worldwide. Coordinated by the EDRI office, members including **EFF, SUPERRR, IT-Pol, CCC** and others **worked collectively try to ensure that the evolving political narrative remained nuanced, evidence-based and grounded in fundamental rights.** This included active participation in policy processes at EU level, such as **EFF’s engagement in the European Commission’s stakeholder meeting** on its proposed age verification application, as well as EDRI’s second *coordinated submissions providing detailed feedback on the draft guidelines under Article 28 of the DSA.* This was complemented with direct engagement with policymakers, including MEPs.

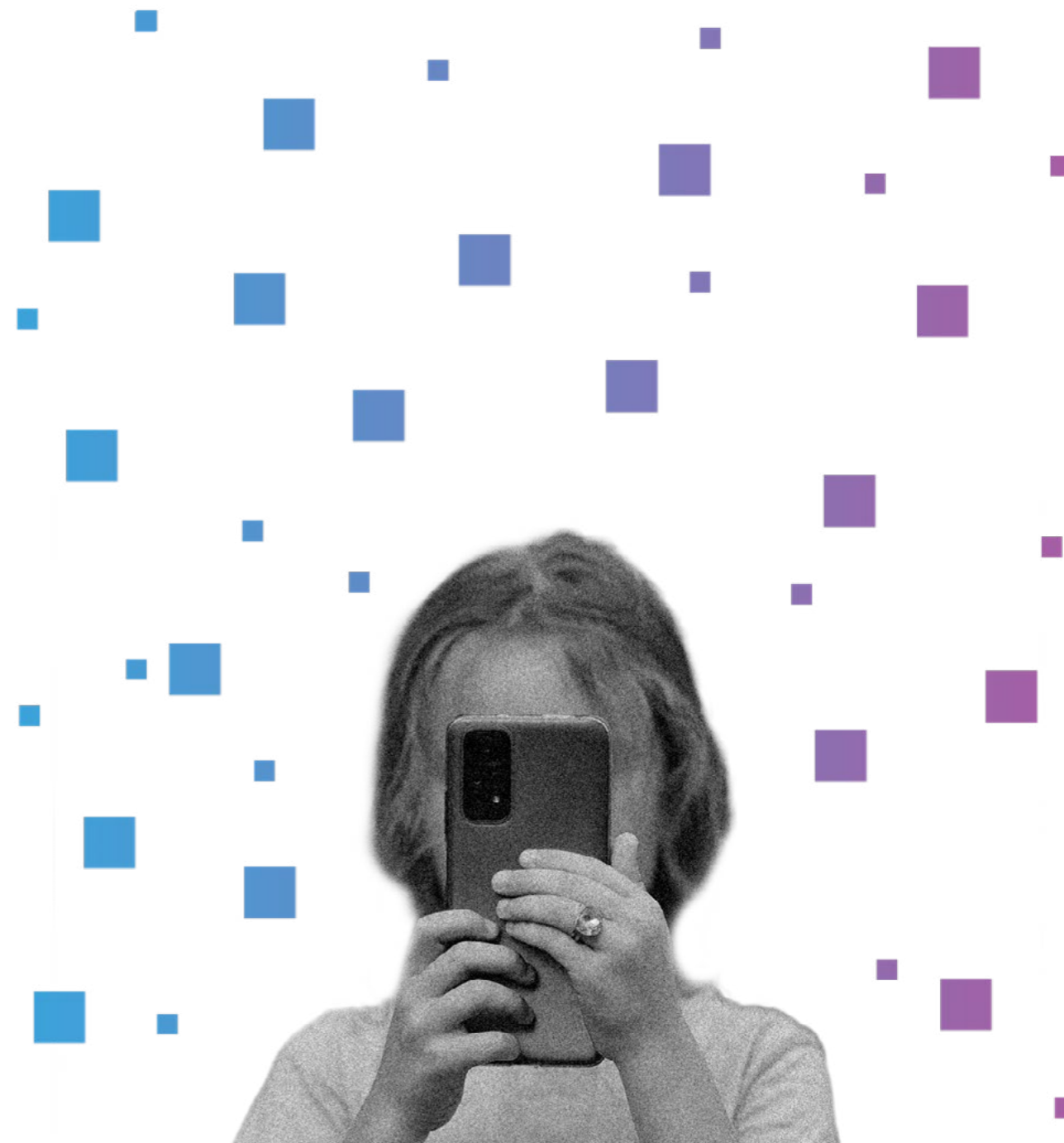
Across these efforts, the network consistently emphasised the risks associated with overly broad and exclusionary age verification measures, including their impact on privacy, anonymity and freedom of expression. At national level, this work translated into tangible policy impact.

In Poland, Panoptykon’s sustained advocacy and critical analysis of draft legislation on the protection of minors online led to **significant improvements in the proposed framework.** **In Ireland,** *The ICCL and DRI helped generate public debate and media attention* around the risks of social media bans for children in the country and the broader implications of age verification policies, contributing to a more informed and critical public discourse. **While in the UK, ORG** called for the government to regulate age assurance providers in the wake of the implementation of *the Online Safety Act.*

In parallel, members continued to provide critical expertise and analysis on age verification and related regulatory trends at both European and global levels. **In Germany, SUPERRR worked on a joint civil society position on age verification in digital environments** with the German Child Protection Association, reinforcing a shared, rights-based approach across sectors. While, **EFF played a leading role in examining the broader implications of age verification technologies,** situating European developments within a *global context* of expanding age-gating requirements.

Looking ahead, the network also continued to engage proactively with emerging legislative initiatives shaping the future of platform regulation like the upcoming DFA. Across all these areas, EDRI and its members have consistently **advocated for approaches that prioritise empowerment, digital literacy and safer platform design over exclusionary or surveillance-based measures,** strongly cooperating with youth organisation. As part of these efforts, EDRI hosted a panel at the annual CPDP conference, which focuses on privacy and data protection. Youth advocates and representatives discussed what it means to exist and resist as a young person in digital spaces.

Protecting minors and addressing online harms does not come at the expense of fundamental rights, but instead it requires actions that build a safer, more inclusive and rights-respecting digital environment for all.



Simeon de Brouwer,
Policy Advisor,
European Digital Rights

“Age verification is a form of exclusion, not empowerment. It disregards the evolving capacities, agency and autonomy of young people.”

DIGITAL SELF-DETERMINATION

Another prominent area of work has been on the EU hot topic of digital sovereignty, which we approach through the lens of "digital self-determination", in recognition of our aims to put people at the center of tech policy and in favour of an open, rather than closed, internet.

We initiated a first network-wide discussion to shape EDRi's position on this topic, creating space for members to align on key principles and priorities. In parallel, we joined the **Democratic Tech Alliance**, a cross-party group of MEPs, supported by a small number of NGOs and industry actors, that promotes a rights-based vision of digital sovereignty. Following initial engagements, including the opportunity to present our concerns regarding the proposed Digital Omnibus to Alliance MEPs, we subsequently joined the Alliance's steering group.

During 2025, we contributed to these discussions by participating in high-level events, talking to the press and raising awareness about digital self-determination, as well as presenting alternatives to current dominant tech models. To both topics, **we dedicated sessions of Privacy Camp 2025.**

At the national level, **in Slovenia, DJND** advocated for the introduction of mandatory open-source criteria in public procurement of technology.

In Germany, Digital Gesellschaft launched the *"Open networks and democratic public sphere"* coalition, fostering dialogue and action around democratic digital infrastructures.

In Switzerland, Digitale Gesellschaft Schweiz published a *position paper* outlining its perspective on digital sovereignty and related policy measures.

Beyond policy advocacy, members also contributed to raising awareness and promoting practical alternatives to dominant Big Tech ecosystems.

At the end of December, **CCC co-launched the "Digital Independence Day" initiative**, encouraging individuals to reduce their reliance on major technology platforms. **In Germany, Digitale Gesellschaft co-organised the second FediDay in Berlin**, bringing together 150 participants and 23 speakers over two days to **promote the Fediverse as a sustainable and decentralised social media alternative**, while strengthening collaboration among developers, administrators, researchers, civil society and content creators.

Additionally, **Pangea participated in a congress** focused on technological self-determination, contributing to broader discussions on the societal and environmental dimensions of digital infrastructures.

These activities reflect a growing and coordinated effort across the network to advance a people-centred, rights-based concept of digital sovereignty.

FREEDOM OF EXPRESSION & INFORMATION

In 2025, we **launched the Civic Journalism Coalition**, which is a collaboration between the **EDRi office, EDRi member ECNL, and Lighthouse Reports**. This coalition has already been successful in bringing together journalists and digital rights groups and has catalysed several joint investigations into digital rights abuses.

The coalition awarded **small grants to six journalistic teams** for their research, of which the first two were published in 2025. The first article *shines a light on Ireland's data center crisis*, and the second on the *harms of Germany's AI infrastructure boom*.

Additionally, together with co-leads ECNL and Lighthouse Reports, we held webinars on topics like data access for journalists, and convened the group for an in-person workshop which helped to further solidify the group.

EDRi members continued monitoring and pushing for freedom of expression and information in their national contexts.

In Serbia, **SHARE Foundation** published a series of *retrospectives on ten years of the digital rights struggle in the country*. They also published *their annual monitoring report* of digital rights in Serbia in 2025. This report was accompanied by *a photo exhibition highlighting students protests in Belgrade* and how the movement grew.

EDRi member **Metamorphosis Foundations's** tool, *Disinformation Radar for the Balkans*, Disinformation Radar for the Balkans, was selected among the thirty solutions showcased at the Paris Peace Forum 2025. It was subsequently **chosen for the Paris Peace Forum Scale-up Program**, which supports global innovations for democratic resilience. The tool addresses disinformation as a cyber threat to peace, democracy, and EU values. Targeting vulnerable populations in Western Balkans – especially young people, minoritised communities, and civic actors – it uses AI to monitor, analyse, and counter disinformation campaigns that exploit ethnic tensions and political divisions.

In Turkey, Alternatif Bilişim joined a campaign organised by the *FreeWeb Turkey initiative* to **free students facing house arrest due to their social media posts** during the anti-government protests in Turkey. Thanks to this campaign, 127 people, mostly students, were acquitted without charges.

Mnemonic also published several reports on their **archiving work and the role of misinformation in conflict contexts**. These reports tell a rich story of the specific underreported impact of mis- and disinformation in a conflict setting. These experiences show the fault lines of how platforms, governance and the lack of action shapes discourse and conflict

In 2025, EDRi was mentioned in press 1684 times




Selection of articles EDRi was mentioned in:

 <p>Brussels admits EU funds flowed to spyware firms after FTM probe</p>	 <p>'Digital fortress europe': A test lab for surveillance tech?</p>	 <p>Um travão aos abusos online de crianças ou uma ameaça de vigilância em massa? A proposta de regulamento europeu que está a gerar polémica</p>
 <p>Europe 'must not be bullied' by Trump and Musk on tech laws, NGOs say</p>	 <p>La UE concede a las tecnológicas 16 meses más para que su IA de "alto riesgo" cumpla la normativa</p>	 <p>De "herramienta clave" a "deficiente": reacciones al nuevo Código de IA de la Comisión Europea</p>
 <p>Targeting the EU</p>	 <p>Europol, una buona riforma dell'agenzia deve evitare la sperimentazione della tecnologia sui migranti</p>	 <p>Weniger Datenschutz, kaum Entlastungen für KMU</p>
 <p>EU to delay 'high risk' AI rules until 2027 after Big Tech pushback</p>	 <p>Rights groups slam EU for rolling back AI data protection rules</p>	 <p>European parliamentarians implore EU leadership to stop funding spyware</p>
 <p>Frivolous Google copyright claims 'censor' Investigate Europe gambling exposé</p>	 <p>Mort de « Jean Pormanove » : « Concentrer le blâme sur l'Arcom est une erreur »</p>	 <p>Europa test leeftijdsccontroles op het internet: is dit het einde van online anonimiteit?</p>
 <p>Meta's new content policies may impress Trump, European regulators not so much</p>	 <p>Widespread alarm over Commission's hesitant DMA enforcement</p>	 <p>EU lacks guidance on AI prohibitions, as rules start to apply</p>
 <p>Un algoritmo en el gobierno: Albania nombra ministra a una IA para tapar la corrupción institucional</p>	 <p>Hoe we ons van X bevrijden</p>	 <p>Kann uns Trump das Internet abschalten?</p>

Selection of EDRi op-eds:

 <p>The mirage of EU techno-solutionism to the climate crisis</p>	 <p>Why the new Europol regulation is a Trojan Horse for surveillance</p>	 <p>Europe is dismantling its digital rights from within</p>
 <p>The EU's Digital Omnibus Must Be Rejected by Lawmakers. Here is Why.</p>	 <p>Moving past 'Chat Control' to solutions that truly protect kids and privacy</p>	 <p>The GDPR is being hollowed out — for whom, and why?</p>

Selection of EDRi's interventions in broadcasts and podcasts:

 <p>Sky ecc: la messagerie du crime</p>	 <p>Tendances Première: Reconnaissance faciale dans l'espace public : où en est-on en Belgique ?</p>	 <p>EU gegen BigTech: Folgen des Zollstreits für die Regulierung</p>
 <p>Brussels under fire for softening grip on Big Tech</p>	 <p>Inside the face scanning tech behind social media age limits</p>	 <p>Bye, bye, Big Tech! Wie Europa digital unabhängig wird</p>



Chloé Berthélémy featured in the documentary SkyECC: La messagerie du crime



Jan Penfrat interviewed by CNA about EU's new guidelines to better protect children online

3. Our Finances

3.1.	INCOME	47
3.2.	EXPENDITURE	50

3.1. INCOME

The EU funding landscape, in line with global trends, is becoming increasingly restrictive to a vibrant civic space, limiting civil society organisations' ability to operate and fulfil their missions effectively.

In 2025, these shifts accelerated at an unprecedented pace and intensity, driven by a range of geopolitical and other global factors. This has resulted in **significant funding shortfalls** occurring in parallel with a **continued shrinking of civic space**.

Despite this shift, EDRI was able to maintain strong financial stability and lay the foundations for a successful year ahead thanks to its proactive approach. In 2025, **EDRI was able to mitigate the most immediate threats** through investing in thorough risk assessments and ensuring its compliance with donors' requirements, with a cautious and multi-pronged fundraising approach needed to help the organisation continue adjusting to detrimental contextual changes.

Rapid changes are shaping the current environment and defining new realities across all sectors. Building on EDRI's strong organisational capacity to adapt, and its continuous critical reflections on fundraising practices, we aim not only to navigate evolving conditions and funding challenges, but also to **view these shifts as opportunities for innovation and organisational development**.



EDRI's total income amounted to €2,467,057 in 2025.

This was achieved mainly thanks to continuing support from our other long-term valued foundation partners, including the Open Society Foundations, the Ford Foundation, the MacArthur Foundation, the Adessium Foundation, the Limelight Foundation, Stiftung Mercator, Civitates - the European Democracy Fund, the European Artificial Intelligence & Society Fund, and the Democracy & Media Foundation.

EDRI receives funding from a range of sources; however, foundation funding continues to generate the highest proportion of EDRI's income. **In 2025, up to 16 foundation partners provided just over 72% of the total annual funding** to contributing to the advancement of EDRI's mission.

EDRI extends sincere thanks to the Aspiration for their generous support towards its organisational development in 2025.

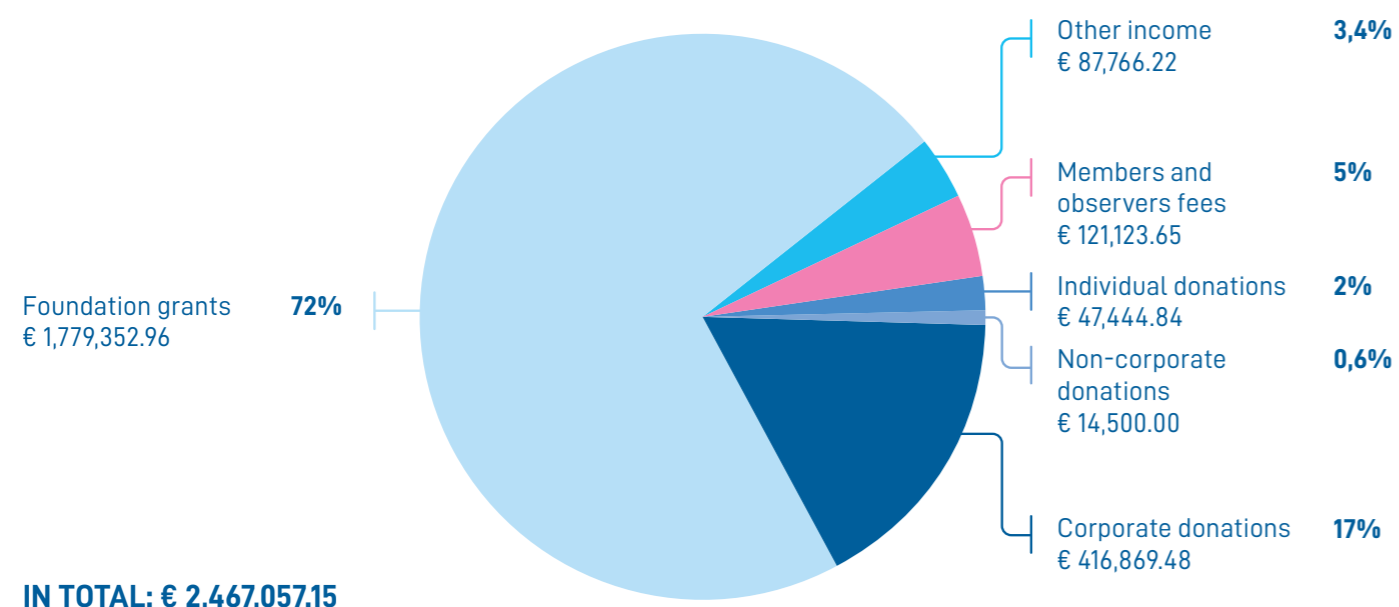
In addition to funding challenges outlined earlier in this chapter, the year was also marked by significant organisational developments, notably the launch of the EDRI Network Strategy 2025–2030 and a leadership transition.

Other funding sources included contributions from corporate and non-corporate donors (together nearly 18%), annual membership fees and additional donations from the EDRI network (5%), and donations from our committed community of individual supporters (2%).

In 2025, EDRI's leading corporate donors included Vodafone Germany, Mozilla and DuckDuckGo, whose combined contributions exceeded €400,000.

Corporate donations were partly generated through sponsorship contributions for the 13th edition of EDRI's flagship event, the Privacy Camp Conference 2025. We extend our sincere appreciation to NordVPN, Surfshark, Ommm Ventures, Tech Hive Advisory, Kobler, and new event sponsor FlokiNet.

The European Data Protection Supervisor (EDPS) continued to be the general partner and the conference's largest contributor. Additional non-corporate support was provided by EDRI's partner organisation, the Center for AI and Digital Policy (CAIDP).



INCOMES 2025

MEMBERS' AND OBSERVERS' FEES	€121,123.65
INDIVIDUAL DONATIONS	€47,444.84
NON-CORPORATE DONATIONS	€14,500.00
European Data Protection Supervisor (EDPS)	€14,000.00
Center for AI and Digital Policy	€500
CORPORATE DONATIONS	€416,869.48
Vodafone Germany	€250,000.00
Mozilla	€109,331.92
DuckDuckGo	€42,837.56
NordVPN	€5,000.00
Ommm Ventures	€5,000.00
Surfshark	€2,500.00
FlokiNET	€500.00
AMNEZIA VPN	€500.00
Kobler	€500.00
Tech Hive Advisory	€500.00
Secure Software	€200.00
FOUNDATION GRANTS	€1,779,352.96
Network of European Foundations	€240,000.00
Aspiration	€225,509.65
Stiftung Mercator	€192,914.63
Ford Foundation	€154,839.47
Adessium Foundation	€140,000.00
European AI & Society Fund	€128,434.00
MacArthur Foundation	€126,570.83
Open Society Foundations	€108,936.71
Open Society Justice Initiative	€105,876.07
Limelight Foundation	€87,500.00
Luminate / The Omidyar Group	€71,305.33
Civitates – The European Democracy Fund	€67,901.85
Allianz Foundation	€45,637.90
Goeie Grutten Foundation	€45,000.00
Democracy and Media Foundation	€30,000.00
Mozilla Foundation	€8,926.52
OTHER INCOMES	€87,766.22
Other incomes	€11,336.78
Sub-renting of the office and related costs	€76,429.44
TOTAL OPERATING INCOME	€2,467,057.15

In 2025, EDRI's total expenditures reached just over €2,387 million, with the largest part of expenditures allocated towards advocacy work (nearly a third of total expenditures), followed by EDRI network development (24.45%), and campaigns and communications (just under 24%). The fundraising-related expenditures accounted for 5.3%.

EDRI aims to maintain its human resources, financial and administrative expenses at appropriate and reasonable levels (18.75%). By the end of 2025, the EDRI team comprised 19 full-time and one part-time staff member.

EDRI continued to provide financial support to EDRI network members and close partners through its internal participatory grant-making scheme. Regranting increased from €85,300 in 2024 to over €200,000 in 2025.

The funding enabled EDRI network members and close partners (listed alphabetically) to carry out work in the following 3 areas:

1) Platforms accountability (advocacy & campaigning work)

- ApTI - Asociatia pentru Tehnologie si Internet (Romania)
- European Center for Not-for-Profit Law / ECNL (Netherlands)
- Gong (Croatia)
- Homo Digitalis (Greece)
- La Quadrature du Net / LQDN (France)
- Mnemonic (North Macedonia)
- Open Rights Group / ORG (United Kingdom)
- Panoptykon Foundation (Poland)

2) Secure and trustful communications including on SS7 (advocacy & campaigning work)

- Digitale Gesellschaft (Germany)
- epicenter.works (Austria)
- Homo Digitalis (Greece)
- Iuridicum Remedium / IuRe (Czech Republic)

3) Organisational strengthening (including providing critical stopgap funding helping to sustain running costs of organisations in times of disruption)

- Danes je nov dan / DJND (Slovenia)
- Digitale Gesellschaft (Germany)
- Iuridicum Remedium / IuRe (Czech Republic)

- La Quadrature du Net / LQDN (France)
- Politoscope (Croatia)
- Statewatch (United Kingdom)

The support provided under area 1 was made possible thanks to two of EDRI's valued funders, *the Mercator Stiftung* and *Civitates – The European Democracy Fund*, and under area 2 thanks to *the Open Society Justice Initiative*, which provided much-needed funding to support the EDRI network and the wider digital rights ecosystem at a time of unprecedented need. Area 3 was funded from EDRI's own unrestricted grants.

EDRI continued to strengthen its long-term financial resilience by maintaining both an Operating Reserve Fund and a designated Social Reserve Fund, which together totalled €891,000 at the end of 2025. In line with Belgian legal recommendations for international non-profit associations and good governance practices, EDRI aims to build reserves equivalent to up to 6 months of operating costs. By the end of 2025, the Operating Reserve Fund covered 4.3 months of operations, reflecting steady progress towards this target and reinforcing the organisation's financial stability and capacity to manage risk.

Two significant events from this year included the 13th edition of the EDRI's annual flagship event, **the Privacy Camp conference 2025** in September, and **the Digital Rights Lounge – powered by Privacy Camp** in the run up of the CPDP.ai conference 2025 in May, both taking place in Brussels. For both, event expenditures partly consisted of contributions towards the travel and accommodation of EDRI network members, partners and digital rights activists from across Europe and beyond.

The annual General Assembly 2025 of the EDRI network took place in Paris (France) in May 2025. The three-day event, hosted by EDRI's French member organisation LQDN, welcomed over 80 EDRI network representatives.

DIRECT PROGRAMME EXPENSES

Advocacy work 28,1%
€ 670,410

INDIRECT MISSION SUPPORT

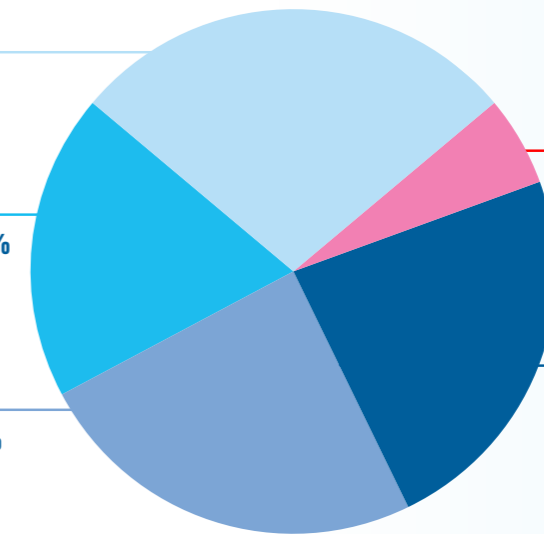
Human resources, finances and administration, office expenses 18,75%
€ 447,662

Network development and governance 24,45%
€ 584,115

INDIRECT PROGRAMME EXPENSES

Fundraising 5,3%
€ 126,368

Campaigns and communications 23,4%
€ 559,073



IN TOTAL: €2,387,627.43

www.edri.org

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.



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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