



# Online Political Advertising and Microtargeting: The Latest Legal, Ethical, Political and Technological Evolutions

Webinar Series Report, 15 and 18 June 2020



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## Executive summary

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Electoral campaigns are central to influencing how people vote and also affect people's perception of the legitimacy of a country's elections and democracy in general. In 2016, the results of both the Brexit referendum in the United Kingdom and the presidential election in the United States brought to light the new techniques used by political parties and other stakeholders in electoral campaigns. The Cambridge Analytica scandal made the topic the focus of global attention. These techniques pose a new challenge to democracy, as they alter the way political campaigns take place and impact on people's voting behaviour. Governmental institutions, researchers, citizens and other actors increasingly question whether there is a need for more or better regulation and oversight, and what form these can take.

In recent years, International IDEA, the Dutch Ministry of the Interior and Kingdom Relations, and the European Commission have engaged in initiatives and taken steps to better understand and/or address the issue of online political advertising and digital microtargeting. International IDEA published a Political Party Innovation Primer on Digital Microtargeting (2018), which explores how political parties around the globe have integrated legitimate microtargeting practices into their campaigns. In June 2019, International IDEA and the Dutch Ministry of the Interior and Kingdom Relations co-organized a roundtable on the regulation and oversight of online microtargeting by political parties in election campaigns (Joseph and Heinmaa 2019). The Netherlands is one of the countries that is developing national legislation on transparency for online political campaigns. The upcoming Law on Political Parties is to include rules that must guarantee and increase the verifiability of online campaigns, prevent deception and provide clarity about who has paid for an ad (Netherlands House of Representatives 2020). At the European Union level, the European Commission is currently preparing a Digital Services Act Package (2020a) and European Democracy Action Plan (2020d) targeting online political advertising among other things. Relevant EU initiatives since 2016 include the implementation of the General Data Protection Regulation (GDPR) and the voluntary EU Code of Practice on Disinformation. The GDPR (European Commission n.d.) establishes strict guidelines based on individual consent for the collection and processing of personal data, placing limitations on the use of digital microtargeting for parties. The EU Code of Practice on Disinformation (European Commission 2018b) sets commitments for platforms on countering disinformation, one of which includes greater transparency in political advertising. Furthermore, the Commission's package of measures to secure free and fair European elections provided recommendations to member states and political parties to ensure greater transparency of political advertising and communications (European Commission 2018a).

On the back of these developments, International IDEA, the European Commission and the Dutch Ministry of the Interior and Kingdom Relations organized two roundtables on online political advertising and microtargeting in June 2020. The event included oversight bodies from 24 countries. Discussions covered such topics as what sets online campaigning apart from traditional campaigning, the rights and freedoms potentially affected by the use of digital microtargeting and online campaigning, gaps in current regulations, and division and coordination of oversight roles both domestically and internationally.

The key issues discussed that impact on the building of effective frameworks were:

- **Accountability gap.** An accountability gap is created using massive amounts of personal data in untransparent ways and the provision of countless ads to different audiences to impact on people's political choices. Regulatory oversight by public authorities and meaningful scrutiny by stakeholders and citizens should be possible.
- **Acknowledging benefits.** Online political advertising and microtargeting present a number of important benefits in facilitating more effective campaigning. These techniques are generally inexpensive and easily accessible, allowing new candidates greater visibility and voters to be more readily engaged.
- **Safeguarding democratic rights and freedoms.** Any framework should respect people's freedom of expression, balance voters' right to receive information with their right to privacy, and ensure free and fair elections to serve the general interest instead of being captured by narrow interests.
- **Regulatory gaps and ineffective resources.** A lack of clear, agreed-upon definitions of terms, insufficient platform self-regulation, fragmented enforcement responsibilities, insufficient monitoring and analysis capability, and sometimes poorly resourced oversight agencies challenge relevant frameworks.
- **Coordination.** National authorities need to reflect on what kind of division of roles and coordination at the national and international levels would make frameworks more effective and improve them accordingly.

Suggested steps for moving forward included:

- Invest more in **inter-agency and international cooperation** between regulators and oversight agencies and cooperation with online platforms.
- Develop a better **common understanding of the issues at stake**, facilitated by researching the impact of online political advertising and microtargeting, **sharing tools and experiences**, and drawing from relevant work of non-governmental organizations (NGOs) and think tanks.
- **Increase transparency** on the use of data and targeting of people to provide clarity on advertisers, protocols and spending.
- **'Restore the human scale'** to online advertising: mandatory limits on the amount and type of data that can be used for targeting is a possible option to build a workable and **proportionate accountability system**.

# 1. Introduction

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On 15 and 18 June 2020, International IDEA, the European Commission and the Dutch Ministry of the Interior and Kingdom Relations organized two digital roundtables on online political advertising and microtargeting (Joseph and Heinmaa 2019). Online political advertising and microtargeting is attracting increasing attention from governments and citizens alike, with many examining whether more or better regulation and oversight are needed, and what form these can take.

The webinar series was convened to advance the understanding of the implementation of rules on and oversight over online political advertising and microtargeting in ensuring safe and fair elections, and to support the exchange of good practices, as well as to inform policy initiatives and potentially support the development of guidelines, rules and oversight frameworks. The first session was dedicated to exploring the scope and limitations of existing legal frameworks for online political advertising and microtargeting. The second session focused on the oversight of rules and regulations, experiences with the application of GDPR for online political microtargeting, and the effectiveness and capability of oversight structures.

The online discussions brought experts together with members of the European Cooperation Network on Elections. These members included oversight bodies such as electoral commissions, ministries of the interior and data protection authorities from 24 countries. Additional participants provided a balance of perspectives, new voices and geographic spread and included leading European and global experts from civil society, academia and technology companies.

With COVID-19 only accelerating the use of online campaigning, the need for more understanding and transparency, especially on social media platforms, seems increasingly important. A major challenge is posed by the need to provide cross-sectoral responses in the context of rapidly changing practices. Several tools are already available to monitoring and enforcement authorities, but their resources and connections with other regulators are often insufficient.

## 2. Understanding the opportunities and risks

The term ‘online political advertising’ describes three things:

1. the use of online platforms and social media profiles by political parties and politicians to publish messages and communicate with citizens;
2. ‘organic’ online campaigning through citizens’ interactions with political party communications, such as citizens sharing or re-posting messages qualifying under point 1; and
3. the use of paid online advertising services, either as provided directly by online platforms or via intermediaries such as digital marketing analysts and data brokers.

‘Microtargeting’ relates to a number of techniques used by social media platforms and other market actors offering services, in the context of online advertising, which apply online user data to direct content towards individuals and groups with defined characteristics.

While targeting voters is nothing new for campaigning, microtargeting is different in important ways. Online microtargeting occurs when three steps are implemented to serve users ads: first, personal data is collected; this is then used to identify subgroups; and finally, these groups are used to send tailored political messages to individuals. The crucial point to consider when thinking about microtargeting is that its use is rooted in massive amounts of *personal data*, often collected without the user’s understanding while they browse the Internet. Table 1 illustrates how personal data enhances traditional campaigning methods.

Table 1. The benefits of personal data for digital microtargeting vs traditional targeting

Traditional targeting	Digital microtargeting ads
1. Collecting	Increased availability: big data sets
	Easier access: digital footprints
	Better storage
2. Segmenting	Predictive analytics
	Psychological targeting
3. Personalizing	A/B testing
4. Communicating	Pairing voter profiles with social media



A central challenge for effective oversight is the question of how to align the wide array of actors involved with the even more numerous problems, regulations and oversight bodies (see Figure 1).

Figure 1. Main actors, problems, regulations and oversight bodies involved in online political advertising

Actors	Problems	Regulation	Oversight
<ul style="list-style-type: none"> <li>• Political parties</li> <li>• Political activists</li> <li>• Platforms</li> <li>• Data brokers</li> <li>• Political consultants</li> </ul>	<ul style="list-style-type: none"> <li>• Privacy</li> <li>• Transparency</li> <li>• Party funding</li> <li>• Campaign spending</li> <li>• Campaign period</li> <li>• Political level playing field</li> <li>• Narrow segmentation</li> <li>• Define and identify political ads online</li> <li>• Disinformation</li> </ul>	<ul style="list-style-type: none"> <li>• GDPR</li> <li>• Political finance regulation</li> <li>• Campaign regulation</li> <li>• Ethics codes</li> <li>• Advertising regulation</li> <li>• Media regulation</li> <li>• Self-regulation</li> </ul>	<ul style="list-style-type: none"> <li>• Data protection agency</li> <li>• National audit office</li> <li>• Independent transparency panel</li> <li>• Political finance oversight body</li> <li>• Broadcasting agency</li> <li>• Electoral commission</li> <li>• Consumer protection</li> <li>• Party funding supervision committee</li> <li>• Technical regulatory authority</li> </ul>

**Source:** Information provided from a pre-event questionnaire, International IDEA, 2020.

Online political advertising and microtargeting presents additional challenges for oversight actors, including the need for adequate capacity and expertise, insufficient awareness of stakeholders and the related need for provision of guidance to stakeholders. Even where there is sufficient awareness, and investigative and protective powers exist, there is often a lack of oversight and monitoring frameworks or real enforcement competences.

Looking ahead, it is important not to lose sight of the democratic benefits of online political advertising and microtargeting. Although regulation and additional transparency is necessary, the availability of practical online advertising tools facilitates more effective campaigning. People spend large amounts of time on social media, making it easier for parties to attract their attention. Online political campaigning can make it easier for new candidates to establish themselves, as it offers a massive reach at a low cost. These methods also provide new ways of engaging people, as has already been seen with its use in helping to build grassroots fundraising, volunteering or other such initiatives.

### 3. Responses by the European Union

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Regulation (EU, Euratom) No. 1141/2014 of the European Parliament and of the Council of 22 October 2014 lays out the rules and obligations for the funding of European political parties and European political foundations, and provides for their monitoring and enforcement. The General Data Protection Regulation (GDPR) applies to the use of personal data by all actors active in the electoral context, such as European and national political parties, European and national political foundations, platforms, data analytics companies and public authorities responsible for the electoral process. They must process personal data (for example, names and addresses) lawfully, fairly and in a transparent manner, for specified purposes only.

The main legal framework relevant to online political advertising at the EU level is provided by the GDPR. Although it contains no specific provisions on political advertising or microtargeting, it is strict on the use of personal data, particularly that pertaining to political opinions. The processing of such data is prohibited in principle and can only be done with the explicit consent of the individual concerned. While this is promising in concept, enforcement experiences have generally been poor. This also applies beyond the EU. For example, the Information Commissioner's Office, which serves as the UK's data protection agency, found 'shocking disregard' for the personal privacy of voters by players across the campaigning system—from data companies, to brokers, to social media platforms, to campaign groups and political parties themselves (ICO 2018). The EU continues to play an important role, especially through the GDPR framework and related enforcement, helping to develop a better understanding of its usefulness and available options for addressing concerns related to microtargeting. Table 2 provides an overview of the main initiatives of the EU to move forward in these areas.

Table 2. European Union initiatives for addressing concerns over online political advertising

<b>European Cooperation Network on Elections</b>	The European Cooperation Network on Elections will continue to facilitate the exchange of best practices on the use of microtargeting through a comprehensive approach and building on experiences gained.
<b>Evaluation report on the GDPR</b>	The European Commission (2020b) published an evaluation report on the EU's GDPR.
<b>EU Code of Practice on Disinformation</b>	The European Commission (2018b) will publish an evaluation of the Code of Practice on Disinformation, taking into account that cooperation with social media platforms remains a key element in developing an effective response to disinformation.
<b>European Democracy Action Plan</b>	The European Democracy Action Plan (European Commission 2020c) will be constructed around three themes: elections integrity and how to ensure electoral systems are free and fair; strengthening freedom of expression and the democratic debate, looking at media freedom and media pluralism, as well as at the role of civil society; and tackling disinformation in a coherent manner. The Action Plan will also draw on the report on the 2019 elections to the European Parliament (European Commission 2020b).
<b>EU Digital Services Act Package</b>	The intended EU Digital Services Act Package (2020b) will help to create new transparency obligations on who paid for ads. While the ePrivacy directive can be a useful tool in the future, it is currently still in the EU legislative chain. When implemented, it could represent an important tool in strengthening rules on tracking users across browsers and devices.

## 4. Responses by the Council of Europe

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The Council of Europe highlights additional relevant aspects. For the Council of Europe, political advertising falls under the fundamental rights framework, as it is directly linked to freedom of expression. The European Court of Human Rights takes a broad understanding of political advertising, which includes paid ads on matters of broader public interest, such as those by non-governmental organizations (NGOs) and campaign groups. Under article 10 of the European Convention on Human Rights (ECHR) from the Council of Europe, publishing information ‘with a view to influence voters’ is an exercise of one’s freedom of expression, ‘irrespective of the fact that it is presented as a paid advertisement’.

Two cases illustrate the legal precedents for regulating political advertising set by the courts. The first, *TV Vest AS and Rogaland Pensioners Party v Norway*, ruled in favour of TV Vest VS right to run advertisements, arguing that regulation of political advertising must consider the privileged position of free speech under article 10 of the European Court of Human Rights (ECHR 2009). However, the second case, *Animal Defenders International v the United Kingdom*, demonstrates the uncertainty of how to set proportionate limitations on free speech in political advertising (ECHR 2013). A very divided court ruled that the rules banning paid political ads in the UK did not violate freedom of expression because there could be a risk of distortion of public debate by wealthy groups with unequal access to political advertising. This ruling indicates that, while free speech is privileged under article 10, the courts will accept, in some circumstances, that restriction may be consistent with freedom of expression.

## 5. Developing regulatory frameworks

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Participants generally communicated three basic principles behind existing efforts to address online political advertising. Firstly, to respect the fundamental right to freedom of expression and uphold the value of political advertising for democracy. Secondly, to balance voters' right to receive information with their right to privacy. Finally, to maintain free and fair elections to serve the general interest instead of being captured by narrow interests.

There are also a number of goals behind country responses to changing methods of online political advertising. Participants expressed the need for modern campaign legislation that embraces the role of the Internet, upholds media neutrality, and includes such new players as sellers and buyers of data and other new campaign intermediaries. Greater transparency is often a primary goal, as countries first aspire to gain a better understanding of the impact of microtargeting and create more transparency regarding the authors, political affiliation, targets, amount of spending and digital imprint of those circulating ads. Countries may also aim to reduce the space for targeting by placing limits on the amounts of personal data or segmentation that can be used.

Currently, the urgency with which this issue is tackled at the national level is very different between countries and regionally. Most participants, however, showed great interest in the presentations and continued sharing of experiences and practices, as many expected this topic to become a growing priority in the years to come.

### Existing rules and next steps in regulation

Regarding legislation, there is still a limited number of initiatives regarding the use of microtargeting in political campaigning. Recent legislation in France states that voters must be provided with fair, clear and transparent information regarding promoted content related to a 'debate of general interest' (Republic of France 2018). The Canadian Elections Modernisation Act of 2018 mandates a registry with an electronic copy of each 'election advertising published on the platform'. In the United States, certain states have passed their own bills, and new transparency rules for online ads are set at the federal level with the Honest Ads Bill and the Social Media Disclosure Act of 2018. However, the general response from platforms has been that, rather than complying with requirements, they disallow certain categories of advertisements or political advertisements altogether during the campaign period. In research commissioned by the European Partnership for Democracy on elections in Czechia, Italy and the Netherlands, as well as the elections to the European Parliament, problems identified included issues in adapting traditional-media-focused legislation to deal with the kind of content that political ads can feature online. Despite the lack of clear data

regarding enforcement of GDPR rules, the conclusion was that more guidance is needed on managing political microtargeting.

Useful immediate steps towards new legislative initiatives could concern campaign finance reform. Some participants seemed optimistic on the ability for increased disclosure requirements across the political spectrum to address some problems associated with political advertising. Focus on campaign finance enables regulators to sidestep any issues surrounding freedom of expression and to build on existing regulations. For example, it was mentioned that Ireland has already filled a gap in regulation by mandating the same imprint requirements for online advertisements as are needed for traditional media, so that voters know who has published and paid for a certain ad.

## Regulating greater transparency

Transparency was mentioned repeatedly as an important feature of regulations on online political advertising. Firstly, transparency in data use and targeting is important, as people should know why they are being targeted and who is targeting them. Secondly, transparency in who is paying for political advertising is needed, as people should know who is behind an ad and how much money parties and candidates invested in online advertising. In gaining transparency in data use and who is using the data, one can also gain greater transparency around understanding what the impact of online political advertising actually is. Participants agreed that the lack of available data severely weakens our understanding of the impact of such advertising, and hinders our abilities to perform research.

It is also important to define the goals of new rules on transparency—to get a better insight into content and financing of ads, allowing for better understanding of targeting mechanisms and their impact, and the development of standards on transparency. Even where there is agreement on the problem, solutions can be different, particularly across the connected challenges of personal data use/misuse, disinformation, foreign influence, money in politics, and the content of the ads themselves. It was also suggested that a better understanding of the goals behind the use of certain online campaign tools could help regulators to anticipate developments in this field.

The Netherlands is one of the countries that is developing national legislation on transparency for online political campaigns. The legislation is limited to Dutch political parties and does not regulate the online platforms on which these advertisements are placed. In the upcoming Law on Political Parties (*Wet op de politieke partijen*), the Netherlands will include rules that must guarantee and increase the verifiability of online campaigns, prevent deception and provide clarity about who has paid for an ad (Netherlands House of Representatives 2020). The purpose of this regulation is to provide insight into the campaigns for voters. However, it is important to strike a balance between transparency and limiting the administrative burden for political parties.

## International cooperation

In looking forward, regulators must ask themselves which are the appropriate roles/competences for the national level, and which are appropriate at the international level. Generally speaking, participants expressed preferences for party-related regulations to remain at the national level, including monitoring their activities and imposing penalties. Where competences are needed at the international level is where the nature of political advertising itself becomes international—at the level of the intermediary or platform, or in the event of cross-border campaigning. Options for co-regulation and greater transparency at the international level include agreements against outside interference and international standardization or guidelines (for instance, by the Council of Europe or the EU Code of

Practice on Disinformation). Regulators must also be mindful of which goals they wish to achieve. For example, data protection law priorities are often around data privacy, whereas priorities in political financing will often be focused on maintaining a level playing field.

Regulators should also be mindful of recent experiences that indicate that, when mandatory measures and regulations are introduced, platforms have taken the approach to prohibit political advertising. For example, after stricter rules were articulated, Twitter and Google disabled political ads during the campaign period in France, and in Canada Google disallowed certain categories of ads.

## 6. Enhancing oversight

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Regarding oversight, while participants prefer that some competences, such as in political finance, remain at the national level, they felt an increasing need for international coordination and standardization in certain areas, in addition to experience sharing. This need is particularly due to the cross-border nature of online platforms, consistently cited as a problem across country experiences. International coordination could take the form of mutual cooperation with platforms, including on co-regulation. To help remedy information imbalances and remove obstacles to research, requirements could be set at the international level for more transparency from platforms on their use of AI/algorithms, ad content and ad buyers and the impact on users. It could be useful to establish rules at the EU level to increase platform transparency or set technical standards. The provision of more guidance and clarifications at the EU level could contribute especially towards the consistency of application of the GDPR. However, before any of these steps can be effectively achieved, there is the need for an agreed, joint definition of the problem.

### Existing responses and next steps in oversight

There are a number of similarities and differences between national-level oversight responses. Common features relate to the fact that existing rules are generally contained in the electoral regulations and are limited to election time. The broad range of existing rules includes disclosure and disclaimer rules, regulating the use of personal data, political ad archives or registries and campaign finance disclosures, prohibiting foreign political advertising and even prohibiting online political advertising. Similar across countries is the leading role of the GDPR in regulating the use of microtargeting. National rules are also generally concentrated on spending limits and reporting of spending and donors. The differences between countries are more numerous. Some countries have adopted a requirement for ads to include whomever commissioned and paid for the ad; other countries may have issued unofficial guidance for parties, reminding and encouraging them of their obligations under the GDPR. Diverging approaches taken by countries include reliance on self-regulation without sanctions, or initiatives for active regulation; generic rules for political advertisements, or specific online advertising rules; and establishing the same rules for all online advertising, or setting specific rules for political advertising, and if specific rules are chosen, whether to create exceptions or further restrictions.

Progress in oversight generally involves increasing the amount of information available to oversight agencies and civil society. Additional transparency in campaign advertisements could be enacted in several forms, among which are: (a) creating additional transparency requirements across a broader definition of political advertisements; (b) establishing



mandatory ad libraries for campaigns; or (c) requiring transparency across all advertisements (regardless whether political or commercial). An important problem to consider in choosing from different options is the difficulty of policing the labelling of ads, as those ads that fall somewhere between ‘political’ and ‘commercial’ can slip through the cracks. There are also suggestions to commit online platforms to showing a full range of ‘marketing profiles’ with no information on political preferences, to require additional verification for ads to be run by platforms, to place limits on the number of ads a campaign can run, or to ban the use of microtargeting altogether. Reducing the complexity of data is also a useful method to ensure that there is useful transparency and effective oversight of advertisements. Participating experts recommended to ‘restore the human scale’ to online advertising to ensure that new campaigning methods have a proportionate accountability system. This goal could be achieved through mandatory limits of the amount and type of data that can be used for targeting.

### Ensuring greater transparency in oversight

Transparency also relies heavily on the interest of civil society in applying or disseminating the insights. To this end, the question was asked whether voters actually care about these issues. The answer to this question could consist of three elements: impact, meaningful understanding, and the results of current research. Regarding impact, while there is no certainty regarding the extent to which political advertising, even traditional advertising, can actually sway voters, there is some evidence that voters respond in certain ways to parties that use certain forms of advertising—particularly attack ads. However, the bigger problem to voters remains the misuse of voter and personal data. Some participants questioned whether citizens possess the meaningful understanding required to properly assess whether this issue concerns them. Finally, some participants referenced current studies stating that the majority of voters do care (Dobber et al. 2019), and often disapprove of opaque and unaccountable use of their personal data in microtargeting (Turow et al. 2012; Centre for Data Ethics and Innovation 2020).

Another issue with effective transparency, for both citizens and regulatory staff, is a lack of understanding across topics such as what political ads are, how they function, the differences between online counterparts, and the fact that political online ads allow more tracking of their viewers’ interactions. Applying offline regulations directly to online regulations, without understanding how the online sphere differs, will end up in insufficient regulations. The question of meaningful understanding by the electorate is difficult. The electorate must be asked whether they understand the basic commercial value of voter data, sometimes referred to as ‘surveillance capitalism’,<sup>1</sup> to understand what digital politics is: it uses the same tools as digital marketing does, and it is essential for democracy that voters, regulators and politicians understand the convergence between consumer and commercial marketing.

### International cooperation

Oversight could be supported across borders through information sharing. Information sharing could include the exchange of best practices or technical details on monitoring, regulation, oversight, and the protection of fundamental rights. Information exchanges could also include advice on deepening data protection awareness, providing guidance and increasing media literacy.

Cooperation with platforms can be challenging for various reasons. While some countries have achieved active cooperation with platforms, other countries have seen little to no cooperation between regulators and platforms. In countries with significant markets, platforms often interact more actively with oversight bodies. The EU can play a role in

providing collective access to those platforms, where smaller countries cannot. Regulators and other stakeholders are often highly dependent on platform-provided transparency measures, creating an information imbalance. However, despite the challenges that these realities bring along, agencies and stakeholders often make use of the provided tools. NGOs and academia have an instrumental role in filling information gaps, both through independent research and by providing citizens with tools to gain insight on how their personal data has been used. Organizations such as Who Targets Me? provide users with browser extensions that enable them to gain more control over and understanding of their personal data—for instance, by tracking which ads were targeted to them, and why. NGOs and academia can also provide software to supplement various transparency tools—for example, to help users interpret ad libraries.

### Endnotes

1. Surveillance capitalism describes a market-driven process where the commodity for sale is personal data, and the capture and production of this data relies on mass surveillance of the internet. See: Holloway (2019).

## 7. Conclusion

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The discussions revealed that, with political advertising and microtargeting, there is a fine line between ensuring that new tools are useful and available to parties and citizens, and limiting techniques that threaten electoral integrity. However, the perceived urgency of addressing the issue with new regulations differed significantly between participating country representatives. This difference is largely due to a lack of joint understanding of the potential impact, opportunities and threats of political advertising and microtargeting.

Regulation was a greater priority in countries where political advertising and microtargeting have already been used on a large scale. Regulation of political advertising and microtargeting is increasingly taken by some as an advocacy issue, particularly among participating experts. Calls for greater legislative initiatives by advocates could eventually come into conflict with the representatives of government agencies, who may still feel uncomfortable about wielding greater authority in addressing the issue. However, legislators may be reluctant to put restrictions on the very techniques that bring them political success.

Responsibility for oversight of political advertising and microtargeting can be widely distributed among different agencies. Competences can be dispersed without a clear lead or joint approach between them, indicating a need for more inter-agency collaboration. Political advertising and microtargeting also features a significant cross-border component, complicating efforts and necessitating EU and other international cooperation.

Personal data regulation represents a useful starting point for a joint approach towards online platforms, as the EU already has established rules under the GDPR. Drawing attention to the regulation of personal data enables us to focus on the mechanisms behind content delivery, rather than the content delivery itself, the regulation of which can fall foul of freedom of expression. However, there is still much disagreement on the extent to which GDPR rules suffice, and a wide variety of approaches to its application.

Looking forward, there are two possible solutions to be highlighted for future rules and oversight at various policy levels. The first is to increase the transparency of political advertising and microtargeting to enable meaningful access to the information on the data use and targeting behind ads. Greater transparency rules would also help to enable more effective cooperation between countries and platforms, as well as enable more research about the impact of political advertising and microtargeting. The second possibility is to reduce the complexity of political advertising and microtargeting to a 'human scale'. Reducing the scale of ads could be achieved by placing limits on the number of different ads a party or candidate can run and/or the amount of data that can be used for targeting specific groups of voters.

## National and EU guidance and tools

<b>Belgium</b>	<a href="#">Guidance</a> note with reference to data protection (2018)
<b>France</b>	<a href="#">Communication politique</a> : quelles sont les règles pour l'utilisation des données issues des réseaux sociaux (2016)
<b>Greece</b>	<a href="#">Guidelines</a> for the processing of personal data for the purpose of political communication (2010)
<b>Ireland</b>	<a href="#">Report</a> of the Interdepartmental Group on Security of Ireland's Electoral Process and Disinformation (2018) <a href="#">Proposal to Regulate Transparency of Online Political Advertising</a> (November 2019)
<b>Lithuania</b>	<a href="#">Recommendation</a> on the processing of personal data during elections (2019)
<b>Luxembourg</b>	<a href="#">Guidelines</a> on holding election campaigns while respecting the protection of personal data (2019)
<b>Netherlands</b>	<a href="#">Mandatory</a> data protection impact assessment, to be used prior to processing data for profiling (2019)
<b>Norway</b>	<a href="#">Digital targeting</a> of political messages in Norway (2019)
<b>Poland</b>	<a href="#">Guidelines</a> for political parties and other actors in the electoral process (2018)
<b>Portugal</b>	<a href="#">Directive</a> regarding the processing of personal data in the context of election campaigns and political marketing (2019)
<b>Romania</b>	<a href="#">Press release</a> on the use of personal data ahead of elections for local public administration authorities in 2020 <a href="#">Press release</a> on the use of personal data in an electoral context (2018)
<b>Slovenia</b>	<a href="#">Guidebook</a> for the organizers of electoral campaigns (2019)
<b>Spain</b>	<a href="#">Circular 1/2019</a> , of 7 March, of the Spanish Agency for Data Protection, on the processing of personal data relating to political opinions and sending of electoral propaganda by electronic means or messaging systems by political parties, federations, coalitions and groups of voters under article 58 bis of Organic Law 5/1985, of June 19, of the General Electoral Regime
<b>Switzerland</b>	<a href="#">Guidelines</a> on the application of Swiss data protection law in the context of elections and popular votes (2019) <a href="#">Report on intermediaries with regards to public opinion making in elections</a> (expected spring 2021)
<b>UK</b>	<a href="#">ICO Guidance</a> on political campaigning (2018) <a href="#">Draft framework code of practice</a> for the use of personal data in political campaigning (2019)
<b>European Data Protection Board (EDPB)</b>	<a href="#">Annex 1</a> to statement on the use of personal data in elections (10 examples as of 2019)

## References

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- Centre for Data Ethics and Innovation, *Online Targeting: Final Report and Recommendations, Independent Report*, February 2020, <<https://www.gov.uk/government/publications/cdei-review-of-online-targeting/online-targeting-final-report-and-recommendations>>, accessed 24 November 2020
- Council of Europe, European Convention on Human Rights, 4 November 1950, <[https://www.echr.coe.int/documents/convention\\_eng.pdf](https://www.echr.coe.int/documents/convention_eng.pdf)>, accessed 7 December 2020
- Dobber, T. et al., ‘Spiraling downward: The reciprocal relation between attitude toward political behavioral targeting and privacy concerns’, *New Media & Society*, 21/1 (2019), <<https://journals.sagepub.com/doi/full/10.1177/1461444818813372>>, accessed 24 November 2020
- European Commission, ‘State of the Union 2018: European Commission proposes measures for securing free and fair European elections’, press release, 12 September 2018a, <[https://ec.europa.eu/commission/presscorner/detail/en/IP\\_18\\_5681](https://ec.europa.eu/commission/presscorner/detail/en/IP_18_5681)>, accessed 20 November 2020
- , ‘Code of Practice on Disinformation’, news article, 26 September 2018b, <<https://ec.europa.eu/digital-single-market/en/news/code-practice-disinformation>>, accessed 20 November 2020
- , ‘The Digital Services Act package’, 22 June 2020a, <<https://ec.europa.eu/digital-single-market/en/digital-services-act-package>>, accessed 20 November 2020
- , ‘Commission report: EU data protection rules empower citizens and are fit for the digital age’, press release, 24 June 2020b, <[https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_1163](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1163)>, accessed 20 November 2020
- , ‘Public consultation: Commission seeks citizens’ views in preparation of new European Democracy Action Plan’, press release, 15 July 2020c, <[https://ec.europa.eu/commission/presscorner/detail/en/IP\\_20\\_1352](https://ec.europa.eu/commission/presscorner/detail/en/IP_20_1352)>, accessed 20 November 2020
- , ‘Data protection’ [n.d.], <[https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en)>, accessed 20 November 2020

- European Court of Human Rights (ECHR), 'Case of TV Vest AS & Rogaland Pensjonist Parti v Norway', Judgment, 11 March 2009, <<http://hudoc.echr.coe.int/fre?i=001-90235>>, accessed 20 November 2020
- , 'Case of Animal Defenders International v The United Kingdom', Judgment, 22 April 2013, <<http://hudoc.echr.coe.int/eng?i=001-119244>>, accessed 20 November 2020
- European Parliament, *Regulation (EU, Euratom) No 1141/2014 of the European Parliament and of the Council of 22 October 2014 on the statute and funding of European political parties and European political foundations*, 4 November 2014, <<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R1141>>, accessed 7 December 2020
- European Partnership for Democracy, *Virtual Insanity? The need to guarantee transparency in digital political advertising*, March 2020, <<https://epd.eu/wp-content/uploads/2020/04/Virtual-Insanity-synthesis-of-findings-on-digital-political-advertising-EPD-03-2020.pdf>>. accessed 7 December 2020
- France, Republic of, Law no. 2018-1202 of 22 December 2018 on the manipulation of information, <<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000037847559&categorieLien=id>>, accessed 20 November 2020
- Information Commissioner's Office (ICO), *Investigation Into the Use of Data Analytics in Political Campaigns: A Report to Parliament*, 6 November 2018, <<https://ico.org.uk/media/action-weve-taken/2260271/investigation-into-the-use-of-data-analytics-in-political-campaigns-final-20181105.pdf>>, accessed 20 November 2020
- International IDEA, *Digital Microtargeting*, Political Party Innovation Primer 1 (Stockholm: International IDEA, 2020), <<https://www.idea.int/publications/catalogue/digital-microtargeting>>, accessed 24 November 2020
- Joseph, O. and Heinmaa, A. E., 'Digital Microtargeting – Challenges for European Regulators', International IDEA, 25 July 2019, <<https://www.idea.int/news-media/news/digital-microtargeting-%E2%80%93-challenges-european-regulators-0>>, accessed 20 November 2020
- Netherlands, House of Representatives, Voortgang voorbereiding Wet op de politieke partijen [Progress in preparation of the Political Parties Act], 11 June 2020, <[https://www.tweedekamer.nl/kamerstukken/brieven\\_regering/detail?id=2020Z10803&did=2020D23378](https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2020Z10803&did=2020D23378)>, accessed 20 November 2020
- Turow, J. et al., *Americans Roundly Reject Tailored Political Advertising* (Philadelphia: Annenberg School for Communication, University of Pennsylvania, 2012), <[https://repository.upenn.edu/cgi/viewcontent.cgi?article=1414&context=asc\\_papers](https://repository.upenn.edu/cgi/viewcontent.cgi?article=1414&context=asc_papers)>, accessed 24 November 2020

## Resources and further reading

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### Resources shared by participants

- Briant, E., *Propaganda Machine: Inside Cambridge Analytica and the Digital Influence Industry* [website for ongoing research], (2020), <<https://www.propagandamachine.tech>>, accessed 24 November 2020
- Commonwealth Secretariat, *Cybersecurity for Elections: A Commonwealth Guide on Best Practice* (London: Commonwealth Secretariat, 2020), <[https://thecommonwealth.org/sites/default/files/inline/Cybersecurity\\_for\\_Elections\\_PDF\\_0.pdf](https://thecommonwealth.org/sites/default/files/inline/Cybersecurity_for_Elections_PDF_0.pdf)>, accessed 24 November 2020
- DFRLab, *Operation Carthage: How a Tunisian Company Conducted Influence Operations in African Presidential Elections* (Washington, DC: Digital Forensic Lab, Atlantic Council, 2020), <<https://www.atlanticcouncil.org/wp-content/uploads/2020/06/operation-carthage-002.pdf>>, accessed 24 November 2020
- Electoral Commission of the United Kingdom, 'Response to the ICO's call for views on a Code of Practice for the use of personal information in political campaigning', 20 December 2018, <<https://ico.org.uk/media/about-the-ico/consultations/political-campaigning-responses/2615400/electoral-commission-political-campaigning-call-for-views-20181221pdf.pdf>>, accessed 24 November 2020
- , *Digital Campaigning – Increasing Transparency for Voters* (London: Electoral Commission, 2019), <<https://www.electoralcommission.org.uk/who-we-are-and-what-we-do/changing-electoral-law/transparent-digital-campaigning/report-digital-campaigning-increasing-transparency-voters>>, accessed 24 November 2020
- European Commission, 'European cooperation network on elections' [n.d.], <[https://ec.europa.eu/info/policies/justice-and-fundamental-rights/eu-citizenship/electoral-rights/european-cooperation-network-elections\\_en](https://ec.europa.eu/info/policies/justice-and-fundamental-rights/eu-citizenship/electoral-rights/european-cooperation-network-elections_en)>, accessed 20 November 2020
- , *Report on the 2019 Elections to the European Parliament* (Brussels: European Commission, 2020), <[https://ec.europa.eu/info/sites/info/files/com\\_2020\\_252\\_en\\_0.pdf](https://ec.europa.eu/info/sites/info/files/com_2020_252_en_0.pdf)>, accessed 24 November 2020

- European Parliamentary Research Service (EPRS), *Regulating Disinformation with Artificial Intelligence* (Brussels: EPRS, 2019), <[https://www.europarl.europa.eu/stoa/en/document/EPRS\\_STU\(2019\)624279](https://www.europarl.europa.eu/stoa/en/document/EPRS_STU(2019)624279)>, accessed 24 November 2020
- Information Commissioner's Office (ICO), 'Investigation into data analytics for political purposes' [list of reports available since 2018], (London: ICO, n.d.), <<https://ico.org.uk/action-weve-taken/investigation-into-data-analytics-for-political-purposes>>, accessed 24 November 2020
- International IDEA, *Cybersecurity in Elections: Models of Interagency Collaboration* (Stockholm: International IDEA, 2019), <<https://www.idea.int/publications/catalogue/cybersecurity-in-elections>>, accessed 24 November 2020
- Irish Government News Service, Proposal to Regulate Transparency of Online Political Advertising, news article, 5 November 2019, <[https://merrionstreet.ie/en/News-Room/News/Proposal\\_to\\_Regulate\\_Transparency\\_of\\_Online\\_Political\\_Advertising.html](https://merrionstreet.ie/en/News-Room/News/Proposal_to_Regulate_Transparency_of_Online_Political_Advertising.html)>, accessed 24 November 2020
- Marsden, C., *Internet Co-Regulation: European Law, Regulatory Governance and Legitimacy in Cyberspace* (Cambridge: Cambridge University Press, 2011), <<https://www.cambridge.org/core/books/internet-coregulation/7179CDF556745BA2313666AEE0A60E70>>, accessed 24 November 2020
- , 'Prosumer Law and Network Platform Regulation: The Long View towards Creating Off Data', *Georgetown Law Technology Review*, 2/2 (2018), pp. 376–98, <<https://georgetownlawtechreview.org/wp-content/uploads/2018/07/2.2-Marsden-pp-376-98.pdf>>, accessed 24 November 2020
- , Meyer, T. and Brown, I., 'Platform values and democratic elections: How can the law regulate digital disinformation?', *Computer Law & Security Review*, 36 (2020), article 105373, <<https://www.sciencedirect.com/science/article/pii/S026736491930384X?via%3Dihub>>, accessed 24 November 2020
- Organisation for Economic Co-operation and Development (OECD), *Telecommunication and Broadcasting Review of Mexico 2017* (Paris: OECD Publishing, 2017), <<http://www.oecd.org/mexico/oecd-telecommunication-and-broadcasting-review-of-mexico-2017-9789264278011-en.htm>>, accessed 24 November 2020
- Privacy International, 'Technology, data and elections: A "checklist" on the election cycle', 17 July 2019, <<https://privacyinternational.org/advocacy/3093/technology-data-and-elections-checklist-election-cycle>>, accessed 24 November 2020
- Tactical Tech, 'Personal Data: Political persuasion. Inside the influence industry' [film], 14 March 2019, <<https://vimeo.com/323661112>>, accessed 24 November 2020
- Who Targets Me, Notify tool (2020), <<https://whotargets.me/notify>>, accessed 24 November 2020



## Further reading

- Borgesius, F. J. Z. et al., 'Online political microtargeting: Promises and threats for democracy', *Utrecht Law Review*, 14/1 (2018), pp. 82–96, <<https://www.utrechtlawreview.org/articles/abstract/10.18352/ulr.420/>>, accessed 24 November 2020
- Council of Europe, *Study on the Use of Internet in Electoral Campaigns – The Rules of the Game: the Internet, Social Media and Election Communications* (Strasbourg: Council of Europe, 2017), <<https://rm.coe.int/study-use-of-internet-in-electoral-campaigns/1680776163>>, accessed 24 November 2020
- Dobber, T., Ó Fathaigh, R. and Borgesius, F. J. Z., 'The regulation of online political microtargeting in Europe', *Internet Policy Review*, 8/4 (2019), <<https://policyreview.info/articles/analysis/regulation-online-political-micro-targeting-europe>>, accessed 24 November 2020
- European Data Protection Board (EDPB), Annex 1 to Statement 2/2019 on the use of personal data in the course of political campaigns (Brussels: EDPB, 2019), <[https://edpb.europa.eu/sites/edpb/files/files/file1/201902\\_edpb\\_statement\\_onelections\\_annexi\\_en\\_2.pdf](https://edpb.europa.eu/sites/edpb/files/files/file1/201902_edpb_statement_onelections_annexi_en_2.pdf)>, accessed 24 November 2020
- European Parliament Think Tank, *An Assessment of the Commission's Proposal on Privacy and Electronic Communications* (Brussels: European Parliament, 2017), <[https://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOL\\_STU\(2017\)583152](https://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOL_STU(2017)583152)>, accessed 24 November 2020
- Hankey, S., Kerr Morrison, J. and Naik, R., *Data and Democracy in the Digital Age* (London: The Constitution Society, 2018), <<https://consoc.org.uk/wp-content/uploads/2018/07/Stephanie-Hankey-Julianne-Kerr-Morrison-Ravi-Naik-Data-and-Democracy-in-the-Digital-Age.pdf>>, accessed 24 November 2020
- International IDEA, *Digital Microtargeting*, Political Party Innovation Primer 1 (Stockholm: International IDEA, 2018), <<https://www.idea.int/sites/default/files/publications/digital-microtargeting.pdf>>, accessed 24 November 2020
- Jaurisch, J., *Rules for Fair Digital Campaigning* (Berlin: Stiftung Neue Verantwortung, 2020), <[https://www.stiftung-nv.de/sites/default/files/rules\\_for\\_fair\\_digital\\_campaigning.pdf](https://www.stiftung-nv.de/sites/default/files/rules_for_fair_digital_campaigning.pdf)>, accessed 24 November 2020
- Nadler, A., Crain, M. and Donovan, J., *Weaponizing the Digital Influence Machine: The Political Perils of Online Ad Tech* (New York: Data and Society Research Institute, 2018), <[https://datasociety.net/wp-content/uploads/2018/10/DS\\_Digital\\_Influence\\_Machine.pdf](https://datasociety.net/wp-content/uploads/2018/10/DS_Digital_Influence_Machine.pdf)>, accessed 24 November 2020
- Tactical Tech, *Personal Data: Political Persuasion - The Guidebook and Visual Gallery*, (Berlin: Tactical Tech, n.d.), <<https://ourdataourselves.tacticaltech.org/posts/inside-the-influence-industry>>, accessed 24 November 2020

Tambini, D., 'Social media power and election legitimacy', in D. Tambini and M. Moore (eds), *Digital Dominance: The Power of Google, Amazon, Facebook and Apple* (New York: Oxford University Press, 2018)

Who Targets Me, 'How Who Targets Me works', webpage, 2020, <<https://whotargets.me/en/how-who-targets-me-works/>>, accessed 24 November 2020

—, 'Ten simple ideas to regulate online political advertising in the UK', Medium.com, 4 June 2020, <<https://medium.com/@WhoTargetsMe/ten-simple-ideas-to-regulate-online-political-advertising-in-the-uk-52764b2df168>>, accessed 24 November 2020

## Annex A. Programme

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**Roundtable on Online Political Advertising and Microtargeting: the latest legal, ethical, political and technical evolutions and Virtual Meeting of the European Cooperation Network on Elections.** Webinar series organized by the European Commission, Dutch Ministry of the Interior and Kingdom Relations, and the International Institute for Democracy and Electoral Assistance, 15-24 June 2020.

**Webinar 1: Monday, 15 June 2020 (11:00-13:00)**

*Exploring legal frameworks for online political advertising and microtargeting, and their implementation:* The objective of the session is to advance the understanding of legal frameworks for online campaigning, exchange good implementation practices and identify remaining implementation challenges.

11:00 – 11:25 **Welcome and Opening Address**

**Mr Eric Stokkink**, Deputy Director for Democracy and Governance, Minister of the Interior and Kingdom relations, The Netherlands

11:25– 11:40 **Presentation on legal frameworks for online political advertising**

**Mr Dr Ronan Fahy**, Senior Researcher, Institute for Information Law, University of Amsterdam

11:40 – 11:50 **Presentation of the survey conducted by International IDEA (findings related to legal frameworks)**

**Mr Peter Wolf**, Senior Expert on digital technologies, International IDEA

11:50 – 12:55 **Practical examples and national experiences**

Discussion

12:55 – 13:00 **Conclusions and Closing of the session**

**Mr Eric Stokkink**, Deputy Director for Democracy and Governance, Minister of the Interior and Kingdom relations, The Netherlands

**Webinar 2: Thursday, 18 June 2020 (11:00-13:00)**

*Enhancing oversight of online political advertising and microtargeting:* The objective of the session is to discuss challenges and efforts to innovate effective oversight of online political advertising and microtargeting.

11:00 – 11:05 **Welcome by:**

**Mr Sam van der Staak**, Head of Europe Programme, International IDEA

11:05 – 11:20 **Keynote Addresses by:**

**Ms Irena Moozova**, Director, Directorate-General for Justice and Consumers (DG JUST), European Commission

11:20 – 11:55 **Presentation of the survey conducted by International IDEA (findings related to oversight)**

**Mr Peter Wolf**, Senior Expert on digital technologies, International IDEA

**Expert considerations and research perspectives:**

- **Mr Julian Jaurisch**, Project Director “Strengthening the Digital Public Sphere | Policy”, Stiftung Neue Verantwortung
- **Mr Sam Jeffers**, Co-Founder, Who Targets Me
- **Mr Gary Wright**, Co-lead Data & Politics programme, Tactical Tech

11:55 – 12:55 **Practical examples and national experiences**

Discussion

12:55 – 13:00 Conclusions and Closing of the session

**Mr Sam van der Staak**, Head of Europe Programme, International IDEA

**Webinar 3: Wednesday, 24 June 2020**

*Meeting of the European Cooperation Network on Elections:* Agenda will be circulated separately to the members of the Network.

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## About International IDEA

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The International Institute for Democracy and Electoral Assistance (International IDEA) is an intergovernmental organization with the mission to advance democracy worldwide, as a universal human aspiration and enabler of sustainable development. We do this by supporting the building, strengthening and safeguarding of democratic political institutions and processes at all levels. Our vision is a world in which democratic processes, actors and institutions are inclusive and accountable and deliver sustainable development to all.

### What do we do?

In our work we focus on three main impact areas: electoral processes; constitution-building processes; and political participation and representation. The themes of gender and inclusion, conflict sensitivity and sustainable development are mainstreamed across all our areas of work.

International IDEA provides analyses of global and regional democratic trends; produces comparative knowledge on democratic practices; offers technical assistance and capacity-building on reform to actors engaged in democratic processes; and convenes dialogue on issues relevant to the public debate on democracy and democracy building.

### Where do we work?

Our headquarters are located in Stockholm, and we have regional and country offices in Africa, Asia and the Pacific, Europe, and Latin America and the Caribbean. International IDEA is a Permanent Observer to the United Nations and is accredited to European Union institutions.

<<https://www.idea.int>>

Electoral campaigns are central to influencing how people vote and can also affect people's perception of the legitimacy of a country's elections and democracy in general. Today, political parties and other stakeholders increasingly use new online techniques in electoral campaigns. Many countries struggle with applying regulatory frameworks on elections to the online sphere, especially as regards online political advertising and microtargeting.

This report provides an overview of the issues at stake and recommendations from two roundtables on online political advertising and microtargeting that were organized by International IDEA in June 2020, in collaboration with the European Commission and the Dutch Ministry of the Interior and Kingdom Relations. It covers topics such as what sets online campaigning apart from traditional campaigning; the rights and freedoms potentially affected by the use of digital microtargeting and online campaigning; gaps in current regulations; and division and coordination of oversight roles both domestically and internationally.