



Hungary's Online Political Advertising Market in Transition

Phase II Monitoring Brief for the European Commission
November 2025 – February 2026

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Executive Summary

This **Phase II monitoring brief** reviews **Hungary's online political environment** from late October 2025 to 20 February 2026, **ahead of the 12 April 2026 parliamentary elections**. It assesses developments concerning TTPA and DSA electoral risk mitigation obligations.

Four key findings were identified.

- First, **internal platform bans have not eliminated paid political influence circulating**. On Meta, candidate-originated ads, proxy pages, and AI-generated campaigns continued at scale, often lacking political classification. Classification was delayed, inconsistent, and usually based on content rather than the advertiser.
- Second, **transparency has declined compared to the pre-ban period** before October, 2025. Repository functionality, traceability, and access to removed content have weakened. Misclassified or unclassified ads do not trigger spending or targeting disclosures, reducing public scrutiny and oversight by authorities. On Google, the removal of the political ad repository and deletion of terminated ads have significantly reduced auditability. On TikTok, repository limitations and intermediary-based promotion restrict oversight.
- Third, Hungary faces a structural **enforcement gap**. A January 2026 freedom of information response from the Ministry of Justice confirms that no competent authority has been designated and that no sanctioning regime has been established under Articles 21–25 of the TTPA. Although the Regulation applies directly, transparency obligations are not practically enforceable at the national level.
- Fourth, **influencer-based political amplification** highlights a structural limitation of the TTPA. When paid or remunerated political messaging is distributed through organic influencer content, repository obligations are not triggered. As a result, researchers have **limited visibility** into these practices.

Drawing lessons from the Hungarian case, the European Commission should prioritise the rapid [establishment of the European repository for online political advertisements](#) and clarify that advertisements **rejected or removed under platform bans must still be recorded**. The repository should be developed with **input from researchers and civil society** to ensure it is genuinely usable for monitoring.

The Commission should also urge Member States, including Hungary, to **designate competent authorities** responsible for enforcement under the Regulation.

In parallel, the DSA enforcement team should inform platforms that **unclear or inconsistently enforced bans on political advertising are problematic**. Where bans exist, they should be clearly defined and properly enforced. Platforms should also be encouraged to maintain a comprehensive, searchable repository of political advertisements, including banned or



rejected ads, as a good-faith effort to mitigate systemic risks to electoral processes under Article 35 DSA.

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1. Purpose and scope

This Phase II Brief follows Liberties' 3 November 2025 [Phase I Brief](#) on Hungary's online environment after the *EU Regulation on the Transparency and Targeting of Political Advertising (TTPA)* took effect. It examines **developments from late October 2025 to 20 February 2026**, the day before the official start of the Hungarian electoral campaign, focusing on Meta, TikTok, and Google in relation to:

- (1) enforcement of internal political advertising bans,
- (2) transparency and data integrity, and
- (3) emerging mobilisation and data-collection strategies.

The analysis synthesises findings from Hungarian investigative and research organisations ([Political Capital](#), [Lakmusz, 444](#)), complemented by Liberties' own monitoring, to inform the European Commission's oversight and enforcement work.

2. Phase I developments

When the TTPA entered into full application on 10 October 2025, [Google](#) and [Meta](#) had already suspended political advertising across the EU. Hungary, where Fidesz and affiliated actors had dominated digital political spending in previous cycles, offered an early test case for how campaign practices would adapt.

Phase I research found that removing **labelled political ads did not eliminate paid political influence**. Instead, activity shifted to less transparent formats.

- On Meta, monitoring identified mislabelled and undeclared political content, AI-generated campaign material promoted as non-political, and large-scale follower recruitment advertising (including data collection) for political channels that were not treated as political. The political ad repository was merged into the general ad repository, resulting in reduced usability and available data.
- On Google, the ban was accompanied by the shutdown of the historical political ads repository and the retroactive reclassification of 60–70% of previously labelled political ads into non-political categories, undermining data integrity and independent scrutiny.

Phase I concluded that internal platform bans, when they are not properly enforced, do not constitute effective risk mitigation under **Articles 34–35 DSA**. Two structural problems were identified: **systematic under-classification** of political advertising and a resulting **decline in transparency**. The analysis also suggested that political campaigning was shifting toward alternative influence channels that are significantly less transparent.

From a **TTPA perspective**, the Phase I report argued that the findings were **relevant for the forthcoming Article 27 evaluation**, mainly concerning scope, definitions, repository design and the treatment of misclassified content.

Phase II assesses **how these dynamics evolved** during the first months of full TTPA application, before the campaign period. Monitoring ended the day **before the official 50-day campaign** for the 12 April 2026 parliamentary elections, which began on 21 February 2026.

3. Meta

Meta's Facebook remains the leading platform for political communication in Hungary. Between November 2025 and February 2026, there was **continued underclassification and definitional ambiguity** in enforcement, along with **structured circumvention** by pro-government actors.

- In the case of Justice Minister and parliamentary candidate Bence Tuzson, three newly created Facebook pages, **presented as lifestyle, infotainment or regional news outlets**, were used to promote short videos featuring the candidate. According to [Political Capital](#), between 9 October 2025 and 26 January 2026, 1,257 paid advertisements were run across the three pages, out of which only 45 ads (4%) were classified as political.
- In February 2026, [a proxy campaign emerged](#) in the constituency of the Justice Minister. A Facebook page entitled "Nem a mi háborúnk" ("Not Our War"), created on 20 December 2025, began disseminating exclusively AI-generated videos centred on war-related fear narratives. Although the page has only a few hundred followers, paid promotion enabled several videos to **reach audiences in the hundreds of thousands**. From mid-January onwards, and exclusively since February, the advertisements have been narrowly targeted at five municipalities in Pest County constituency 5, where Tuzson Bence is the governing party's candidate. Of 129 advertisements placed by the page, Meta had removed only 15 by mid-February, and these removals were reportedly based on violent imagery rather than political content. The advertisements were not labelled as political and did not disclose the use of AI-generated material. While the formal operator of the page is not publicly identified, the messaging coincides closely with prior governing-party campaigns using the same slogan.
- Between 1 January and 11 February 2026, 457 advertisements were launched from the Facebook pages of 407 politicians and organisations [identified by think tank Political Capital](#). The pages are affiliated with Fidesz, TISZA and the Democratic Coalition (DK). In the case of governing Fidesz, 20 out of the 174 affiliated pages identified by Political Capital ran **456 ads within six weeks**. By 13 February, only 31% of these had been classified as political; by 16 February, this rose to 71%, indicating **delayed and uneven post hoc review**. Some advertisers saw nearly all campaigns reclassified, while others experienced minimal changes. The content that was running long before getting stopped and those that were not stopped typically [avoided explicit party slogans](#) but promoted government policies, polling narratives and constituency-based image building linked to the April 2026 elections. Near-identical content sometimes received divergent classification outcomes. Opposition party TISZA displayed no advertising activity, and DK only one ad.
- In parallel with paid advertising (in which platforms are paid to display content), **organised influencer amplification** has, in recent years, become a visible campaign instrument in Hungary and elsewhere. It was reported by [independent Hungarian media outlet 444](#) that during a December 2025 European Council meeting, pro-

government influencers and aligned media figures were transported with the Prime Minister and produced high-frequency, algorithm-optimised content aligned with government messaging priorities. Among the prominent figures active on Facebook are Dániel Bohár and other [Megafon-linked influencers](#), whose pages serve as high-reach distribution channels for political narratives.

4. Google

Google suspended political advertising in the European Union on 22 September 2025 and disabled access to its political advertising repository. Unlike Meta, which keeps violating ads visible in the general Ad Library behind a click-wall, [Google removes](#) these **ads entirely from its public transparency interface once terminated**.

As a result, even if researchers identify likely violators or suspect accounts, it is nearly **impossible to reconstruct** what content was disseminated after Google removes it from the Ad Transparency Center. Monitoring and evidence collection must be real-time, and without keyword search, potential perpetrators must already be known to identify political ads. This weakens independent oversight, prevents systematic analysis, and reduces traceability of likely violations after suspension.

5. TikTok

TikTok has not historically been a primary venue for political campaigning in Hungary. Its smaller reach compared to Facebook and its longstanding ban on paid political advertising made Facebook the preferred channel for pro-government politicians in previous elections.

Following the suspension of overt political advertising on Meta's platforms and on Google services in response to EU regulatory changes, **political actors appear to be exploring alternative formats and platforms**, including TikTok. The platform's younger but now sizeable voter-age user base provides an additional incentive. According to [research estimates](#), TikTok reaches several million adult users in Hungary, with particularly strong penetration among younger cohorts.

Historically, limited political activity on TikTok and **deficiencies in its advertising repository** have led to little systematic monitoring. We conducted exploratory searches in TikTok's "Commercial Content Library" for 2026 using clear political search terms (Fidesz, Tisza Párt, Orbán Viktor, Magyar Péter). The results were:

- "Orbán Viktor", "Magyar Péter", and "Tisza Párt" returned zero results.
- "Fidesz" returned [29 advertisements](#).

Most ads retrieved under "Fidesz" were difficult to classify, though some appeared political. While the repository interface has improved in some areas, significant functional limitations remain:

- The search function appears to operate on exact-phrase matching, limiting discoverability.

- There is no clear trace of ads that were removed for violating the terms and conditions.
- The basis on which certain ads are associated with a search phrase is unclear, eliciting questions about indexing logic.

Without a predefined list of advertiser accounts, systematic monitoring is difficult, especially given the exact-match constraint. Searches in the “Other Commercial Content” library did not return obvious political creators, even when public political figures have active TikTok accounts.

We also observed inconsistent behaviour in the interface. For example:

- Searching only within the 2026 period produced 29 “Fidesz” results, but expanding the time range to include earlier dates changed the ranking and surfaced different, more recent content.
- Narrower time windows sometimes failed to display the newest ads.
- During scrolling, results intermittently disappeared or were replaced with generic repository listings.
- Identical keywords across different time ranges sometimes returned zero results, accompanied by a message indicating that the content may have been political.

These inconsistencies **significantly reduce the repository’s reliability for monitoring**. The combination of exact-phrase search constraints, unclear indexing, absence of removed ads, and unstable interface behaviour makes systematic oversight difficult and undermines confidence in the repository as a transparency tool.

Against this backdrop of limited visibility, Hungarian investigative reporting has identified only one publicly documented case of political advertising activity on TikTok during the monitoring period.

- In January 2026, a Fidesz parliamentary candidate was promoted through the TikTok account of a civil association she founded. A campaign video related to the 2026 election was distributed via paid promotion, reaching over 200,000 users. Since the advertisement **ran through the association’s account rather than the candidate’s official page**, it was not blocked by TikTok’s political advertising restrictions.

6. Issues identified

6.1 Definitional ambiguity and Meta’s Ad Standards

Meta’s published EU policy states that [advertisements about social issues, elections or politics are not permitted to run in the European Union](#). The [English-language version](#) of the policy establishes a clear actor-based trigger: an advertisement made by, on behalf of, or about a candidate for public office falls within scope **independently of whether it explicitly advocates an electoral outcome**. Read in this way, the policy would **support a straightforward enforcement model**, including page-level or account-level blocking of known political actors.

Given that many candidates were previously verified under the pre-ban regime, such filtering would be technically feasible.

The [Hungarian-language version](#), however, can be read as linking candidate status to **influencing the outcome of an election**. Under this narrower formulation, it is not sufficient that an advertisement is posted by a politician; it must also demonstrate electoral intent. If this narrower reading governs, a categorical page-level ban would be over-inclusive, and enforcement would instead require content-based assessment.

In practice, **enforcement** in Hungary corresponds more closely to the **narrower formulation**. Candidate-originated ads framed as informational or constituency-related have often been allowed to run, suggesting Meta is not applying an actor-based prohibition.

Two explanations are conceivable. The divergence may result from imprecise translation. However, its practical effect is significant. The narrower Hungarian formulation allows Meta to avoid a blanket prohibition on all advertisements by politicians in Hungary, while maintaining that it enforces its own EU-wide ban in good faith. If scrutinised under the DSA's electoral risk mitigation framework, Meta can point to its policy language stating that requirements may vary by country, argue that it prohibits advertisements qualifying as political under the TTPA and its own standards in Hungary, and claim that enforcement necessarily involves interpretative judgment in borderline cases. This configuration enables a **defensible compliance narrative**. Meta can assert that it has implemented an EU-wide ban and is attempting to distinguish electoral from non-electoral content, rather than acknowledging under-enforcement. At the same time, the absence of actor-level filtering allows candidate-originated paid communication to continue at scale in Hungary. The observable outcome is systematic under-classification combined with reduced transparency, even as formal adherence to policy is maintained.

6.2 Enforcement gap under the TTPA

On 28 January 2026, Mérték Media Monitor (Mérték Médiaelemző Műhely), an independent Hungarian media policy NGO, [published](#) the results of a **freedom of information request** submitted to the Ministry of Justice regarding Hungary's implementation of the TTPA.

Mérték requested information on:

- the designation of the **competent national authority** (Article 22),
- the adoption of sanctioning rules applicable to advertisers and political advertising service providers (Article 25),
- and the establishment of a register of legal representatives for non-EU political advertising service providers operating in Hungary (Article 21).

The Ministry responded that it “does not process data” related to these matters. This reply indicates that **no legislative or administrative steps are currently underway** to implement the TTPA at the national level.

The result is a structural enforcement gap. While governing-party candidates continue to run paid advertisements that obscure their political nature, there is currently no clearly designated national authority empowered to investigate or sanction potential violations of the Regulation.

6.3 Influencers receiving compensation

Influencer-based political amplification reveals an important limitation of the TTPA, independent of national enforcement gaps.

The TTPA's arguably most important transparency mechanism, the European repository, will be designed to display identifiable advertising transactions within platform advertising systems.

Even if influencers acknowledge receiving monetary compensation or in-kind benefits, such as publicly financed transport, privileged access, or logistical support, they would not be required to submit their posts to the repository due to their status as small enterprises. As a result, if dissemination occurs organically and the platform is not remunerated, repository obligations linked to paid advertising systems are not triggered.

As influencer-based political strategies are expected to grow significantly in the coming years, **EU regulation must adapt** to these new realities.

There are two primary regulatory options for addressing the influencer and amplification gap. First, the forthcoming TTPA review provides an opportunity to **mandate platforms to develop repository inclusion** for self-declared paid influencer content.

Second, the proposed **Digital Fairness Act** could provide a complementary legislative lever by introducing **transparency obligations for platform revenue-sharing programmes**. This could include disclosure of participating creators, the structure of payments and their approximate ranges, and the creation of a user-friendly repository to enable public scrutiny.

The combined effect of these measures could narrow current loopholes and provide both legislative and enforcement tools to future-proof EU political advertising regulation.

7. Recommendations

The Phase II findings reinforce the concerns identified in Phase I. The Hungarian developments suggest that the combination of internal platform bans, declining repository functionality and national enforcement gaps risks creating a regulatory environment in which political advertising becomes less visible without becoming less prevalent.

Several targeted measures could address the issues identified in this monitoring period.

- First, the European Commission should prioritise the **rapid establishment of the European repository** for online political advertisements under the TTPA. Clear guidance should confirm that advertisements rejected or removed under internal platform bans must still be recorded in the repository to ensure transparency and auditability.



- Second, the design of the repository should be developed **in consultation with researchers and civil society organisations** to ensure usability for systematic monitoring and analysis.
- Third, the Commission should urge Member States, including Hungary, to designate **competent authorities** responsible for TTPA enforcement and to establish the sanctioning regimes required under Articles 21–25 of the Regulation.
- Fourth, the DSA enforcement team should communicate clearly to very large online platforms that unclear or **inconsistently enforced bans on political advertising are not adequate risk mitigation measures** under Articles 34–35 DSA. Where platforms maintain bans on political advertising, these bans should be clearly defined, consistently applied and supported by transparent reporting.
- Finally, platforms should be **encouraged to maintain their own comprehensive and searchable repositories of political advertisements**, including advertisements that were rejected, removed or prohibited. Maintaining such archives would constitute a meaningful good-faith effort to mitigate systemic risks to electoral processes and civic discourse under Article 35 DSA.

Together, these measures would strengthen transparency, improve enforcement and reduce the incentives for political actors to migrate toward less visible channels of online influence.