



Hungary's Online Political Advertising Market in Transition: Monitoring Before and After the TTPA's Entry into Force

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INTRODUCTION

The EU Regulation on the *Transparency and Targeting of Political Advertising* (TTPA) entered into [full application](#) on 10 October 2025. The Regulation requires online platforms displaying political advertisements to introduce enhanced transparency and accountability measures. In anticipation of these new obligations, Google [announced](#) in November 2024 that it would cease displaying political advertisements across the European Union as of October 2025. Meta followed in July 2025, [stating](#) that it would likewise discontinue the dissemination of political ads from that date onwards.

The Civil Liberties Union for Europe (Liberties) and its civil society partners have warned about the unintended consequences of **GOOGLE'S and Meta's withdrawal from the political advertising market** ([1](#), [2](#), [3](#)). While their decisions primarily aim to limit regulatory exposure, they may also inadvertently weaken transparency and accountability at a critical moment for democratic discourse.

This report constitutes the **first phase of a monitoring exercise led by Liberties to track how online political communication evolves** in the wake of the exits. Its findings are intended to **inform the European Commission's assessment of the TTPA's early implementation and its impact** on the visibility of political influence online. They provide empirical evidence on how platforms' internal bans and ad labelling practices function in practice, and highlight gaps in detection, transparency, and enforcement that will be central to assessing the Regulation's scope and effectiveness under Article 27. Liberties therefore encourages the Commission to take these insights into account when reviewing the scope and definitions of political advertising, the adequacy of transparency and targeting safeguards, and the future design and operation of the European repository.

The report is also intended as an input to the **European Commission's Digital Services Act (DSA) enforcement team**. In Liberties' reading of Articles 34 and 35 DSA, platforms are required to introduce additional risk-mitigation measures in light of this changed environment. As emphasised in the 2024 [Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes](#) (Guidelines), if platforms choose to ban political advertising, they must ensure that the **ban is appropriately enforced**. Early monitoring suggests this is not the case, and Liberties encourages the Commission to examine whether current practices meet the due diligence standards expected under the DSA.

COUNTRY FOCUS: HUNGARY AS A TEST CASE FOR THE POST-TTPA ENVIRONMENT

With the TTPA now in effect, the withdrawal of Meta and Google from the EU's political ad market creates a rare natural experiment. The **upcoming 2026 Hungarian parliamentary**



elections will be the **first major test** of campaigning in the EU without these two dominant platforms. Hungary provides a particularly relevant case: in previous election cycles, Fidesz, the ruling party, and its affiliated actors dominated digital advertising, outspending all opposition forces combined, especially through Facebook and, to a lesser extent, YouTube.

In a [comparative perspective](#), **Hungary stands out**. During the [2024 EU parliamentary campaign period](#), Fidesz and affiliated actors spent roughly [€4.3 million on Meta and Google ads](#). In the first half of 2024, Fidesz was the top political advertiser on Google across the EU, placing several of the most-promoted videos in the region. In the final month of the campaign, Megafon, a pro-Fidesz proxy outlet, and Fidesz itself ranked among the EU's top 15 political advertisers on Meta.

The withdrawal of Meta and Google from the political advertising market does not imply that **campaign budgets** will cease to exist. Rather, Liberties expects that funds will **migrate into alternative, potentially less transparent channels**. The disappearance of previously dominant advertising avenues raises important questions about how political communication will adjust. Political actors may redirect resources to banner advertising on online media outlets, whether supportive or [hostile](#), or to influencers, pseudo-media, or emerging AI-based tools. They may also attempt to **circumvent the platform bans** by disseminating non-declared or mislabelled political advertising.

Following Meta's announcement of its political advertising ban, observers anticipated a range of [adaptation strategies](#) in Hungary's online political sphere. These include boosting organic reach, reviving smear-site networks, buying or repurposing existing pages, using influencers for undeclared promotion, and testing the limits of ad labelling and enforcement.

The next section presents **early trends** observed after the platform bans. Initial findings indicate **widespread mislabelling, undeclared political ads despite the bans, and the use of AI-generated videos** designed to test detection systems. At the same time, monitoring has become significantly harder, as platforms have **discontinued dedicated political ad repositories** and their general ad repositories lack appropriate searchability and, at times, sufficient data.

CURRENT OBSERVATIONS

The following section summarises what can **currently be observed on Meta and Google**, drawing primarily on the investigative work of Hungarian researchers and journalists. These are mostly not original findings of the Liberties monitoring team, but rather a synthesis and contextualisation of credible Hungarian-language reporting that may otherwise remain inaccessible to EU policymakers and officials due to language and resource barriers. By compiling and framing this information, we aim to provide the European Commission and other stakeholders with a concise, English-language overview of the trends and signals emerging in Hungary's online political advertising landscape as the TTPA enters into force.

META

1. In August 2025, online media outlet *Telex* [reported](#) that the operator of the Instagram page Napiartur had contacted administrators of about 50 popular Hungarian **meme accounts** with offers of up to HUF 4 million (approx. €10,000) per page to **purchase** their profiles. The contacted pages typically had between 30,000 and 60,000 followers.



Several administrators suspected that the real goal was to acquire seemingly apolitical, high-reach accounts and later repurpose **them for pro-government political messaging**, especially in anticipation of Meta's ban on political ads.

2. A short transitional period followed Meta's 6 October 2025 **political, electoral, and social issue advertising ban**. Several major spenders who failed to deactivate their campaigns in time, despite Meta advising them to do so, or even launched new ads hours before the ban, had their ads [continue running](#) for one or two additional days before Meta removed them for [breaching](#) its Advertising Standards. These ads remain listed in the general [Ad Library](#), where information such as **spending range, audience size, and targeting data** (data Meta used to publish about political advertisements running on their platforms) is still available; however, the **actual ad content (e.g., video or text) is no longer displayed**. Thus, researchers cannot investigate what kind of content was attempted to be advertised around the cut-off. (The content of political or social issue ads that expired or were voluntarily deactivated before the cut-off remains accessible.)
3. Online media outlet *Telex* observed on 6 October that Megafon-linked pro-government political influencer Dániel Bohár, posted [advertisements without the political label](#) on the day of the ban, questioning the integrity of the opposition's digital infrastructure and alleging Ukrainian and Brussel-based interests in a data breach. Liberties' monitoring team observed on 28 October that Bohár [continued to disseminate clearly political advertisements](#) until 18 October, with only a limited number subsequently removed by Meta for policy violations.
4. According to investigative outlet [Lakmusz](#), the National Resistance Movement (Nemzeti Ellenállás Mozgalom, NEM), a pro-government actor closely linked to the [Megafon network](#), reached over 30 million views and more than 3.5 million unique users by 22 October through paid promotion of three new AI-generated Facebook videos ([1](#), [2](#), [3](#)) posted after the ban. These videos seem to reflect a **deliberate strategy to test and exploit the boundaries of Meta's enforcement mechanisms** by disguising political content as non-political material. The videos included satirical or fictionalised depictions of opposition leader Péter Magyar, such as a "Tisza-river animal fable," an AI-generated video of a restrained character resembling him, and a Minecraft-themed parody. As they are **not classified as political advertisements**, spending data is not available. Other **transparency data** that Meta used to publish in connection with political ads, including estimated audience size, impressions, and delivery location within the country, are **not available** either.
5. On 28 October 2025, it was reported by [Lakmusz](#), based on the findings of policy research institute *Political Capital*, that despite Meta's declared suspension of political advertising across the EU, [several hundred adverts](#) linked to the **government-aligned Digitális Polgári Körök (DPK) network** have continued to run on Facebook. Researchers identified **over 620 paid advertisements** placed by the *Digitális Demokráciafejlesztési Ügynökség Nonprofit Kft.*, the entity operating the DPK network, many of which remained active or were placed well after the ban. The ads, often presented as community-building or recruitment messages for local "citizen circles," direct users to forms collecting personal data.
6. While Meta justifies its EU-wide ban as a necessary response to what it describes as unworkable and consumer-unfriendly regulation, the **scope of their ban extends far**



beyond the categories of political advertising defined under the TTPA. Meta [prohibits](#) not only political and electoral ads but also advertising on a wide range of [social issues](#), including civil and social rights, crime, the economy, environmental policy, health, immigration, political values and governance, and foreign and security policy. Such a broad ban risks restricting access to information, legitimate public-interest communication and reducing transparency in civic discourse.

GOOGLE

1. Google suspended political advertising across the EU on 22 September 2025, also ahead of the TTPA's entry into application. In late September, policy research and consulting institute *Political Capital* [identified](#) Fidesz-linked advertisements promoting [Harcosok Órája](#) (The Hour of Warriors), a Youtube and Facebook channel established to keep the Fidesz-camp together, that were incorrectly categorised by Google as, for example, "Arts & Entertainment" or "Education" rather than political content. These misclassifications allowed the ads to run during the initial phase of the ban.
2. A subsequent Political Capital [analysis](#), published on 9 October 2025, showed that Google had retroactively reclassified thousands of previously political ads into non-political categories following the suspension. Between 60% and 70% of advertisements from the past year by major Hungarian parties, including *Fidesz*, the *Democratic Coalition*, *Momentum*, and *Mi Hazánk*, were re-labelled under headings such as "Finance, Business & Industrial", or even "Home & Garden".
3. The continued appearance of several political ads on Google's platforms after 22 September was reported by Hungarian media on 1 October 2025. A few days later, *Telex* [observed](#) that the run time of these advertisements appeared to have been **retroactively backdated** to 22 September 2025 in Google's public ad repository, creating the impression that the ban had been properly enforced. As of 28 October 2025, Liberties' monitoring team confirmed that Google's *Ad Transparency Center* likewise [displayed](#) these ads as if they had ended on 22 September.
4. Similar to Meta, Google also disabled access to its historical political ad database (with the general database being [less searchable](#) and researcher-friendly), **severely impeding independent monitoring** by journalists and researchers. In addition, their retroactive reclassifications and backdating **undermine trust** in the integrity of their data.

RECOMMENDATIONS AND CONCLUSION

According to the 2024 Commission Guidelines on the application of the DSA in the electoral context, platforms are expected to:

- maintain publicly accessible and searchable **repositories of political advertisements**, including data on reach, targeting and spending;
- if they do not allow political ads, implement **effective verification and enforcement systems**; and
- ensure that their **advertising systems are not misused** to disseminate misleading or deceptive political content, including AI-generated material.

While these guidelines are not legally binding, they reflect the Commission's interpretation of platforms' due diligence obligations under the DSA.

Liberties urges the **European Commission's DSA enforcement team to assess whether the risk mitigation measures** currently implemented by very large online platforms and search engines are **adequate** under Articles 34-35 DSA, **given mounting evidence** that existing enforcement mechanisms for political advertising bans are not functioning effectively, the advertising systems are easy to misuse and the political advertisements repositories are switched of.

Liberties also urges the **European Commission's TTPA team to clarify to platforms** that, even where they maintain internal bans on political advertising within the meaning of the TTPA and make best efforts to identify and discontinue such content in line with the DSA and the 2024 Guidelines, instances will still arise where political advertisements are misclassified, displayed, and only later removed. In such cases, these advertisements should be transmitted to the **forthcoming European repository** once operational and accompanied by complete and accurate transparency notices, in accordance with Articles 12 and 13 TTPA.

Liberties therefore encourages the Commission to take these insights into account in the context of the **forthcoming Article 27 TTPA evaluation and review**, in particular when examining the scope and definitions of political advertising, the adequacy of transparency and targeting safeguards, and the future design and operation of the European repository. The Commission is further invited to conduct **comprehensive stakeholder consultations** involving civil society organisations, academic experts, media representatives, and competent authorities with a view to identifying appropriate legislative or interpretative updates that would enable the Regulation to **more effectively achieve its declared objectives**.

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