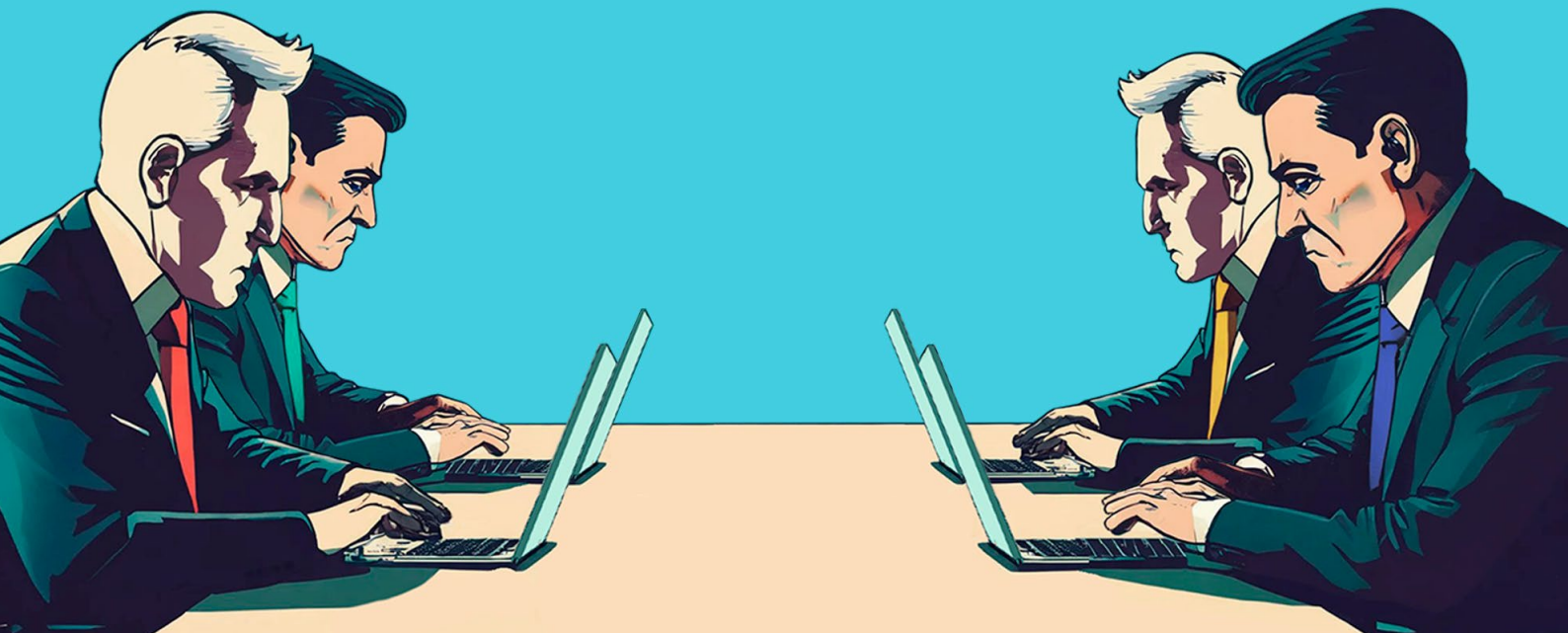# *Elections Monitoring 2024: HUNGARY*

Electoral Integrity and Political Microtargeting in the European Parliament Elections:
An Evidence-Based Analysis

November 2024

About the project

This research paper by the ***Hungarian Civil Liberties Union (HCLU)*** was prepared as a contribution to the project 'Electoral Integrity and Political Microtargeting: An Evidence-Based Analysis in Six EU Member States', coordinated by the Civil Liberties Union for Europe (Liberties).

The research project monitored online political advertising in the run-up to the 2024 European Parliament elections in six EU countries: Bulgaria (BHC), France (VoxPublic), Germany (Reset Tech), Hungary (HCLU), Poland (PAF) and Spain (Xnet), supported by Who Targets Me (WTM) as technical partner. The project relied primarily on data collected during the European Parliamentary elections campaign from political advertisements promoted on Facebook by political entities. Researchers scrutinised whether political actors follow national campaigning rules and European data protection rules by examining data voluntarily donated by citizens through a privacy-friendly desktop browser extension.

The project was co-funded by Civitates and the Open Society Foundations.

Any views and opinions expressed by the author of this research paper are solely those of the author and do not reflect the views and opinions of Liberties or the co-funders.

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Executive Summary

- Hungary's right-wing coalition government has consistently won both parliamentary and European Parliamentary elections for over a decade, while the left-liberal-green opposition has been fragmented and underfunded.

- In the 2024 election, the governing parties won 13 seats, the newcomer Tisza Party won 7 seats, and the Democratic Coalition (DK), Hungarian Socialist Party (MSZP) and Párbeszéd captured two seats, however, significant questions loom over election fairness.

- Unlike in parliamentary elections, EP and municipal elections are not hindered by spending limits for political advertising. State organs are prohibited from campaigning, but this restriction is often not respected.

- Our investigation shows:

  Pro-government ads were targeted less specifically than opposition ads. This can largely be explained by funding disparities.

  Influencers played a major part in the campaign. The partly government-funded Megafon Centre-backed figures presented war and peace messages similar to pro-government TV, employing emotional appeals and unfounded personal claims about opposition figures.

  The lack of transparency in campaign finance benefits the ruling party, which explains its resistance to the implementation of new regulations in the Targeting of Political Ads (TTPA) and the Digital Services Act (DSA).

- The current legal framework overwhelmingly benefits the ruling right-wing government and its candidates. Policy recommendations should include stricter transparency requirements regulating the use of custom audiences, regulating third-party campaigning, and introducing a cap on campaign spending.

I.Country context

The Political and Electoral Landscape

Since 2010, a right-wing governing coalition has consistently won every parliamentary election with a constitutional, that is, two-thirds majority. It has also dominated European Parliament seats since 2009. The state of democracy has been deteriorating due to blurred lines between the state, government, and ruling party, allowing state institutions to legally support government messaging. Public funds are often distributed opaquely to benefit the ruling party.

The left-liberal-green opposition is fragmented and underfunded following their defeat in the 2022 elections, where they ran as a full coalition. Key opposition parties include the Democratic Coalition, Momentum Movement, Hungarian Socialist Party, Dialogue, LMP, and Jobbik, alongside the far-right Mi Hazánk Mozgalom and the satirical Hungarian Two-Tailed Dog Party.

In early 2024, a scandal involving the President and Justice Minister over the pardon of a paedophile's accomplice shook the political scene, leading to their resignations. Around the same time, former governing party figure Péter Magyar emerged as an opposition contender, accusing the government of corruption and inadequate protection provided to minors and announcing the formation of the TISZA party. TISZA then ran in both EP and county elections, held simultaneously on 9 June 2024.

Current Media Landscape in Hungary

Since 2010, the Hungarian government has made significant efforts to reshape the media landscape. Hungarian media can be divided into three main categories.

First, public service media, especially television news channels, are strongly aligned with the government. During election campaigns, they frequently broadcast pro-government messages as news or commentary.

Second, a vast pro-government media empire supports the ruling party's narrative. This empire, largely controlled by the Central European Media and Press (CEMP - KESMA) foundation, owns hundreds of outlets, including TV and radio channels, online platforms, and county newspapers.

Third, the independent press consists mainly of online news outlets and print weeklies, along with some radio and TV stations. However, the independent media sector struggles to operate freely, facing limited access to information while smaller press offices face financial challenges.

The Role of Facebook in Hungarian Campaigns

Social media plays a crucial role in Hungarian campaigns, especially for opposition parties, which rely on it to reach large audiences due to limited public space and resources. Traditionally, the ruling parties relied more on state resources and traditional media, but since 2019, they have increased their social media presence. Ruling party politicians are now active on Facebook and TikTok, with many pro-government messages supported by networks funded indirectly with public money.

In the Hungarian political landscape, Facebook is particularly influential with around 80% penetration across most age groups, while Instagram and TikTok are also significant. X (formerly Twitter) remains of little importance.

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II. 2024 Elections

Results and Trends

In the European Parliament elections, the governing parties won the most seats but secured two seats fewer than in 2019, 13 and 11 respectively. The newcomer Tisza Party, led by Péter Magyar, won seven seats. The Democratic Coalition (DK), Hungarian Socialist Party (MSZP), and Párbeszéd captured two seats, 3 seats down from their previous total. Jobbik and Momentum failed to win any seats, losing one and two respectively, while Mi Hazánk, which did not reach the threshold in 2019, got one MEP elected.

In the municipal elections, the governing parties lost control of several smaller municipalities, with no significant changes in county-seat towns. Most mayors in Budapest and its districts remained in opposition, and no party gained the majority needed for an independent city government in the Budapest City Assembly.

The Fairness and Freedom of Hungary's Elections

Hungarian elections have long-faced criticism for lacking fairness. Amendments to electoral laws, intended to boost voter power, have created an uneven playing field due to limited publicity. The close ties between the state, government, and ruling party give the governing forces significant resource advantages, while opposition parties face government pressure through audits and resource cuts. Voters are often influenced by financial incentives (e.g. existential threats) and bussed to polling stations on election day. However, there are no major concerns about the counting process or result tabulation.

The Campaign

The governing parties' main message centred on war and peace, particularly in the context of Russia's war against Ukraine. They emphasised the importance of peace and claimed that the European Union and the Hungarian opposition were 'pro-war. Discrediting Péter Magyar was another key focus. Pro-government influencers, like Dániel Deák and Kristóf Trombitás, actively spread these messages on social media.

Opposition parties, however, lacked a unified message and focused on various issues, especially local ones such as environmental concerns and the risks posed by battery factories. Their messages often explicitly targeted winning voter support.

In the municipal elections, held alongside the EP elections, governing party candidates also promoted the peace message, suggesting that local leadership could help prevent war in Hungary. In some municipalities, local messages targeted the perceived incompetence of opponents. No referendum was held alongside the elections.

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Regulations and Disclosure Requirements for Political Ad Funding and Limits

There is no spending limit for campaign expenditures or political advertising in EP or municipal elections, unlike parliamentary elections. Political parties are prohibited from accepting contributions from legal entities, organisations without legal personality, foreign states, non-Hungarian individuals, or anonymous donors. Also, NGOs may have candidates at municipal elections, and in this capacity, they are not allowed to accept foreign funds or funds from legal entities. It is also noteworthy that state organs (e.g. the government) and municipalities are legally barred from campaigning on behalf of any political actor. However, in reality, this is not observed in many respects.

III. Description of the data collected

The Who Targets Me (WTM) extension was used by 511 users in Hungary, with 440 identifying as male, 64 as female, and 7 as other gender. The participants were not representative of either the Hungarian population or the Hungarian Facebook user base. Thus, there are limitations to what can be concluded from observing the data.

The 2024 elections in Hungary were special in that they were not only EP elections, as in many EU countries, but also local elections. It is important to note that the ads could not be distinctly separated, as many messages were designed to win voter support for both elections. Therefore, our analysis did not examine them separately.

The data provided details on ads and users, including age, gender, location, political


User Count by Age Group
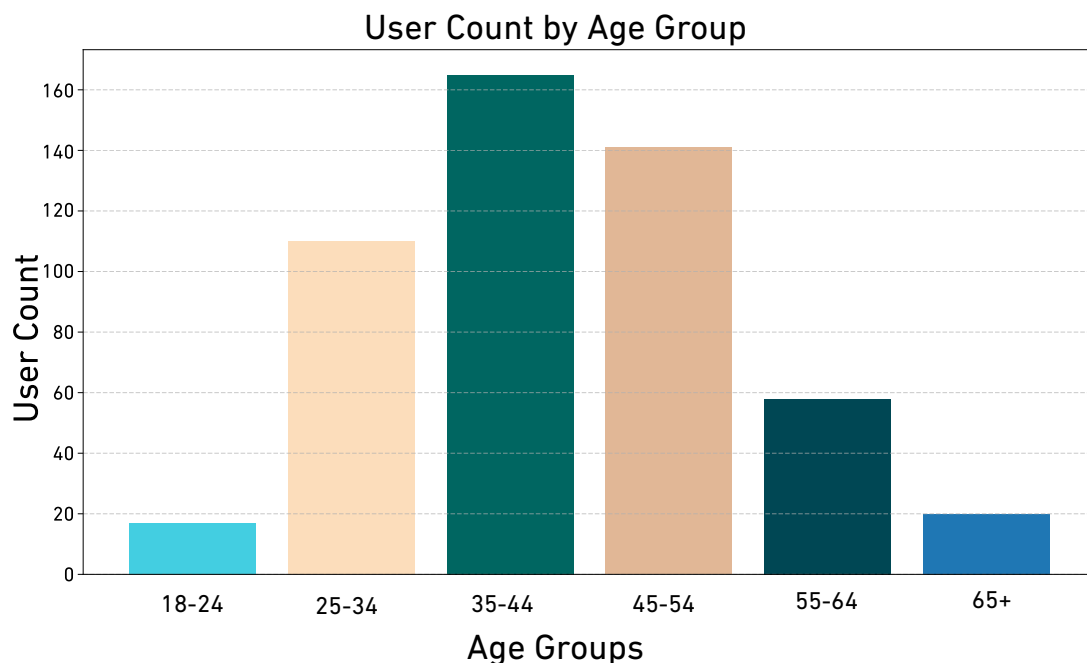
affiliation, and ad specifics like ID, text, and funding source.

The WTM extension was most prevalent among those aged 35 to 44. Following closely were individuals aged 45 to 54.

Users of the extension indicated their political views on a scale from 0 to 7, with 0 for no preference, 1 for extremely left-wing, and 7 for extremely right-wing, while 4 indicated a neutral position. The political breakdown was as follows: 24 users did not declare their affiliation, 35 were extremely left-wing, 108 left-wing, 126 somewhat left-wing, 58 centrist, 32 somewhat right-wing, 9 right-wing, and 117 extremely right-wing. Two users did not provide any political information.

The data the Hungarian Civil Liberties Union (HCLU) analysed was collected by WTM from 10 March to 9 June, leading up to the municipal and EP elections, and included 83,485 relevant ads. The range of the data analysed ends on polling day.

Number of Users by Political Affiliation
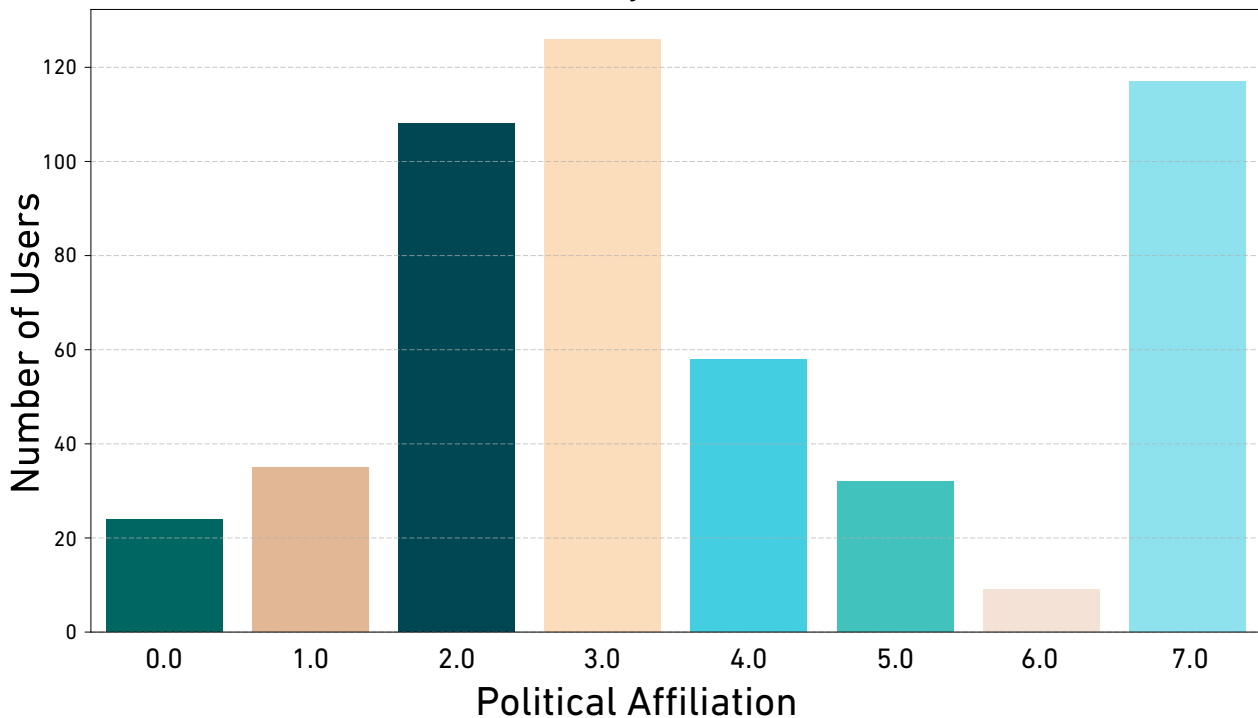
IV. Expenditure

The total political ad spending on Facebook in Hungary during this period was HUF2.46 billion approx. €6.12 million EUR). The top 10 advertisers were Fidesz, Magyar Nemzet, Alexandra Szentkirályi, Viktor Orbán, Origo, hirado.hu, Klára Dobrev, Ripost, Kristóf Trombitás, and Tamás Korondy, with their combined expenditure amounting to HUF1.22 billion (approx. €3.02 million EUR), nearly half of the total. This amount is significant as it is comparable to the combined expenditure of the hundreds of other advertisers.

Among the top advertisers, only Klára Dobrev represented the opposition; the rest were linked to Fidesz or government-affiliated media. PM Viktor Orbán was regarded as the largest spender on election advertising in the EU.[1]

According to the Helsinki Committee's report on the 2024 Hungarian Elections, the lack of a legal cap on campaign spending and opaque financing practices make it difficult to track total campaign expenditures.[2]

Additionally, the issue of third-party campaigning remains unregulated. It was visible first at the 2022 parliamentary elections that political parties used proxies to send their messages. This undermines transparency and indirectly allows state funds to be used in the campaign.

V. Advertisers and ad targeting

The most common targeting criteria for political ads were age and gender, with geographic targeting at the county and municipality levels. Lookalike and custom audiences were widely used: custom audiences appeared in 28,058 of the 83,485 ads, and lookalike audiences in 10,152. In many cases, general targeting settings were used. Interest-based targeting was less common, appearing in 6,508 ads (about 7.8%). Pro-government ads were generally less specifically targeted than those from the opposition. With fewer resources, opposition parties, focused on more precise targeting, particularly in Budapest, while government ads targeted middle-aged and older demographics.

The opposition campaign used a handful of meme sites and news portals to reach their audience, reflecting their limited resources. In contrast, the Megafon Centre, partly government-funded,[3] supported numerous pro-government influencers (third-party campaigners), which played a significant role in the campaign.

1   Politico (2024), 'Orbán leads the way in EU election advertising', 2 June 2024.

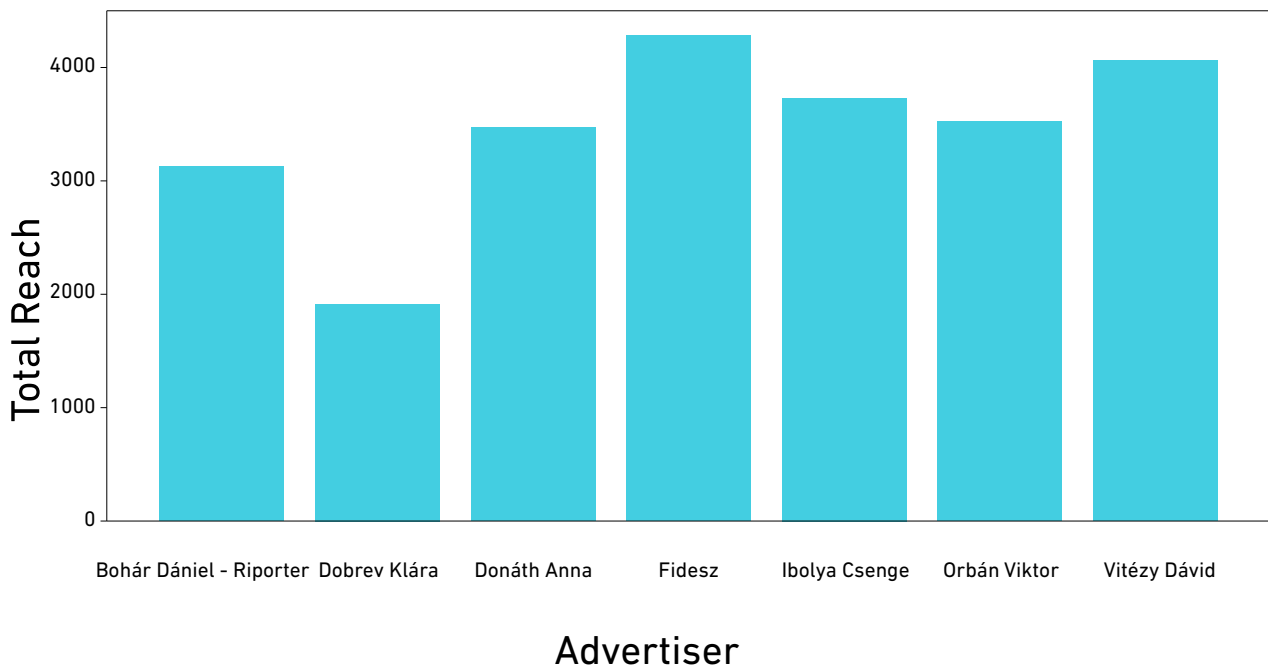2   Hungarian Helsinki Committee (2024), *The elections took place under extremely unequal conditions*, Hungarian Helsinki Committee.

3   Telex.hu (2021), 'They are hungry for recognition from public money: this is how the billions migrate to the government's favorite experts', 25 November 2021; Atlatszo (2021), 'The cabinet office pours the money into the Center for Fundamental Rights through a foundation', 18 March 2021.

Influencers played a particularly strong role in the Hungarian election campaign. The graph below highlights the significance of the influencers. Dániel Bohár and Csenge Ibolya are Megafon-backed influencers, while Klára Dobrev (Democratic Coalition) and Anna Donáth (Momentum) represent leading figures of the opposition. Also included are centrist mayoral candidate Dávid Vitézy, PM Viktor Orbán and the Fidesz party. It's important to note that Facebook's algorithm could significantly shape these outcomes, which we did not assess. The data showed information on how ad targeting is used. However, it did not reveal how Facebook's algorithm responds to user engagement, such as the type of posts a user likes or the duration they spend engaging with a post.
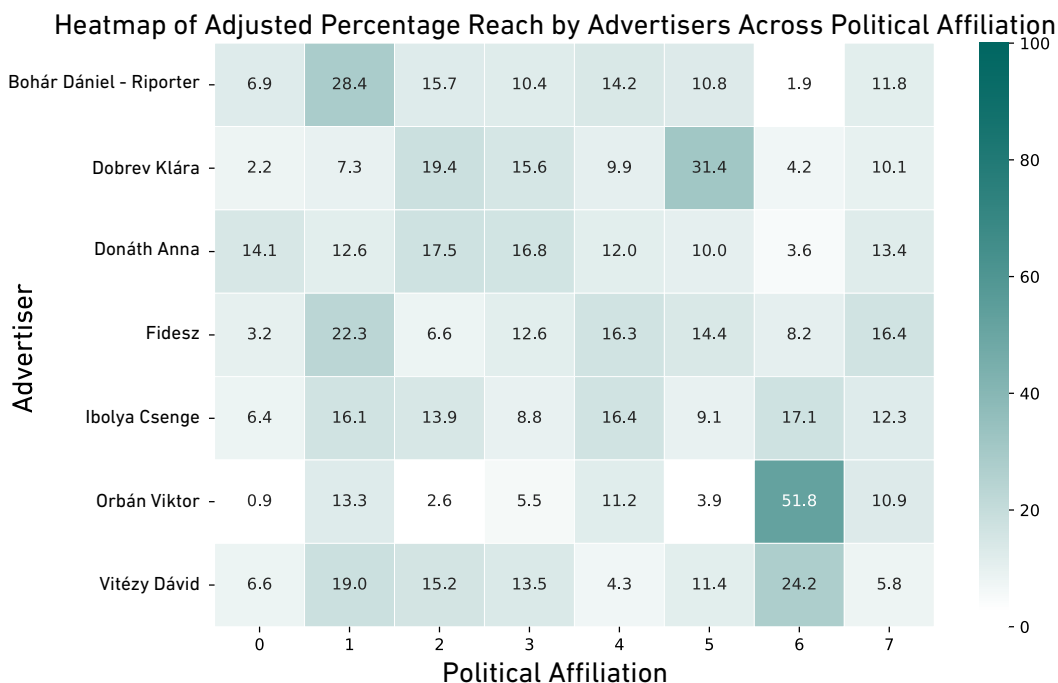
The graph below shows influencers' significance by influencers having similar or even greater reach than prominent politicians, including PM Orbán.

Total Reach by Each Advertiser

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We analysed how these advertisers' ads reached WTM extension users of different affiliations. Notably, over half of Orbán's ads reached right-wing users, likely due to custom audiences and Facebook's algorithm. Meanwhile, influencer Dániel Bohár's and Fidesz's ads reached a significant portion of left-wing users (28.4%). It is difficult to determine the reasons behind this because the use of custom and lookalike audiences lacks transparency, and cannot be fully assessed through the gathered data alone.

that opposition figures tolerate domestic abuse. Klára Dobrev criticised the government on corruption and made strong claims, including accusing Orbán of involvement in a paedophile network, referencing the 2024 scandal. Donáth focused on EU advocacy. Both Dobrev and Donáth criticised the government's insufficient child protection measures. Meanwhile, Orbán's messages emphasized the government's efforts to strengthen the child protection system in Hungary.

Heatmap of Adjusted Percentage Reach by Advertisers Across Political Affiliation

Advertiser	0	1	2	3	4	5	6	7
Bohár Dániel - Riporter	6.9	28.4	15.7	10.4	14.2	10.8	1.9	11.8
Dobrev Klára	2.2	7.3	19.4	15.6	9.9	31.4	4.2	10.1
Donáth Anna	14.1	12.6	17.5	16.8	12.0	10.0	3.6	13.4
Fidesz	3.2	22.3	6.6	12.6	16.3	14.4	8.2	16.4
Ibolya Csenge	6.4	16.1	13.9	8.8	16.4	9.1	17.1	12.3
Orbán Viktor	0.9	13.3	2.6	5.5	11.2	3.9	51.8	10.9
Vitézy Dávid	6.6	19.0	15.2	13.5	4.3	11.4	24.2	5.8

Political Affiliation

Megafon-backed influencers––similar to the ruling party's narrative––focused on war, peace, as well as discrediting opposition figures, particularly Péter Magyar. Their ads suggested European leaders were hungry for war. Bohár predicted a third world war in several ads, recalling the sound of fighter jets from his childhood, while Ibolya used emotional appeals about the hardships of waiting for soldiers or making weapons. These ads also spread unfounded information, such as claims

VI. Regulation and compliance

Regulatory environment

Political advertising in Hungary is governed by various laws, but social media is not specifically addressed in laws regulating election campaigns. Social media ads are classified as

'campaign tools' under Hungary's Act XXXVI of 2013 on electoral procedure (Electoral Procedure Act, EPA). In case of a supposed breach of law, these ads can be reviewed only by election commissions and courts within the framework of the EPA. However, this scrutiny is limited, as these bodies do not assess compliance with campaign finance regulations. But even if they would, as mentioned earlier, there is no spending limit for campaign expenditures or political advertising in European Parliament or municipal elections. This can lead to significantly unequal resources between different candidates, leading to unfair competition.

Under Act XXXII on the operation of political parties (Political Parties Act, PPA), political parties are prohibited from accepting contributions from legal entities, organisations without legal personality, foreign states, non-Hungarian individuals, or anonymous donors. The issue with this regulation is the absence of specific audit criteria, which creates an ambiguous environment and leads to uncertainty for those subject to the legislation.

The PPA is enforced by the State Audit Office (SAO), however, the SAO's case law is highly partisan. In the past, the SAO has put the opposition's expenditure under strict scrutiny, sometimes with questionable legal interpretation, whereas it was lenient towards government candidates.[4] The effects on the 2024 EP campaign are not yet known, as the SAO has not published its findings yet.

The recently adopted Act LXXXVIII of 2023 on the Protection of National Sovereignty (NSA) increases uncertainty for associations and civil society organisations (CSO) by expanding the range of actors subject to scrutiny regarding their funding sources and participation that could influence election outcomes.

At the EU level, political ads and microtargeting are governed by the General Data Protection Regulation (GDPR), the Digital Services Act (DSA), and the Targeting and Transparency of Political Ads (TTPA). While the first two regulations have already been implemented in Hungary, we are not aware of any ongoing processes for the implementation of the TTPA. Notably, Hungary was the only country that did not support the new rules upon their adoption.[5] The current legislative environment of campaign financing clearly lacks transparency. As the SAO does not audit the different actors during the campaign, as a result the lack of transparency will always benefit the ruling party, which might explain the government's resistance.

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4 For example, SAO fined opposition parties in 2022 for cooperating too closely with an NGO which in the SAO's view constituted unlawful campaign finance. On the other side, in 2020, when the government's candidate spent above the cap solely with her Facebook ads in the election campaign, the SAO interpreted the law restrictively (and against the existing doctrine) and did not find any irregularities.

5 Telex.hu (2024), 'Hungarian government only one to vote against EU law on transparency in political advertising', 12 March 2024.

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The use of custom and lookalike audiences likely violates the GDPR because the individuals in a source audience probably did not consent to their data being used for this purpose. It is difficult to tell whose data was used to form a source audience, since this information cannot be determined from the ads a user sees. Both pro-government and opposition advertisers have used this technique.

VII. Recommendations

The current regulatory environment reveals that the existing legislation is limited, raising significant concerns regarding transparency. The absence of spending caps undermines fair competition during campaigns, and the enforcement of requirements by authorities is compromised. Additionally, based on the data we assessed, even users of the WTM extension cannot clearly understand how their data was used during the campaign, nor can they understand the basis for their targeting.

To address these issues, platforms should implement stricter transparency requirements for the use of custom audiences, ensuring that users are well-informed about how their data is utilised and the legal basis for their targeting decisions.

We see the necessity of introducing a cap on campaign spending. Currently, such a cap applies only to parliamentary elections; however, even in this instance it is not properly enforced and can be easily circumvented through third-party campaigning. The cap would aid maintaining fair competition during

election. A related recommendation is that third-party campaigning should be regulated in a manner that respects the fundamental right to free speech. We discussed this issue in detail under the title 'Regulatory environment', highlighting that financial restrictions intended to protect campaign integrity—prohibiting contributions from legal entities or foreign actors—can be circumvented through third-party campaigns, such as those by Megafon-backed influencers, to whom these rules do not apply. Meanwhile, other actors, like CSOs participating in public life and exercising their freedom of speech, may still fear scrutiny from the SAO due to vague legislation.

One key aspect of the campaign was the government's substantial financial edge over the opposition. As a result, pro-government advertisers didn't see the need for microtargeting their ads; instead, they could leverage virtually limitless resources to bombard users with the same message repeatedly. This form of ad saturation amounts to ad *nauseam* repetition—a technique capable of subtly shaping voters' perceptions without their awareness. Curbing the use of repetitive messaging that may influence voters' decision-making unconsciously would be desirable, but of course, not necessarily a straightforward task for large online platforms.

Contacts

Hungarian Civil Liberties Union (HCLU)

Társaság a Szabadságjogokért (TASZ)

The HCLU is a Hungarian human rights watchdog working independently of political parties, the state or any of its institutions. The HCLU's aim is to promote the case of fundamental rights and principles laid down by the Constitution of the Republic of Hungary and by international conventions.

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Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a Berlin-based civil liberties group with 22 member organisations across the EU campaigning on human and digital rights issues including the rule of law, media freedom, SLAPPs, privacy, targeted political advertising, AI, and mass surveillance.

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