

# ***Elections Monitoring*** ***2024: BULGARIA***

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

November 2024



BULGARIAN  
HELSINKI  
COMMITTEE



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## About the project

This research paper by the **Bulgarian Helsinki Committee (BHC)** 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.

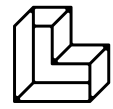
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## Executive Summary

- Bulgaria's political landscape is divided, especially concerning Russian and Western interference, different responses to the COVID-19 pandemic and the Ukraine conflict.
- Recent corruption scandals led to voter passivity in the 2024 elections.
- In the 2024 European Parliament elections, one of Bulgaria's far-right parties gained seats, while the socialist party lost seats.
- Low media literacy rates allow online misinformation and hate speech to flourish.
- Facebook is the dominant platform for political campaigns in Bulgaria.
- The media environment is strictly regulated during election campaigns, but the legal framework for online political advertising is missing due to a regulatory gap. Therefore, the general marking requirements observed in other media do not apply. Third-party spending is also unregulated.
- Our investigation shows:

Prominent right-wing party Vazrazhdane spent far more on traditional media advertising, while the PP-DB coalition focused heavily on Facebook.

The PP-DB coalition received more than twice the combined views of other parties.

Parties used custom audiences, interest and gender-based targeting, as well as lookalike audiences.

To date, we know of no investigations by the CPLD, the Bulgarian Data Protection Authority related to political advertising on social networks.

Following the absence of national regulations, political parties typically adhere to social networks' advertising rules during official campaigns, making their campaign efforts more transparent.

Unofficial pages and groups more frequently violate the rules set by social platforms and publish political ads without marking them political.

This leads to insufficient control mechanisms over political advertising on social networks.

- To allow for a more comprehensive and adaptive regulatory environment, policy recommendations should include detailed definitions of - and distinctions between - aspects of the media infrastructure, and the explicit inclusion of social networks in the regulatory framework as broadcasters.



## I. Country context

### Political and electoral landscape

Bulgaria has 17 seats in the European Parliament and its election process follows a proportional electoral system. The entire country serves as a single multi-mandate constituency and the allocation of mandates is based on votes received by parties, coalitions, and independent candidates.

In 2024, Bulgaria's political environment is characterised by its tumultuous government structure. A caretaker government under Prime Minister Dimitar Glavchev is in power following the collapse of a coalition between the centre-right **Coalition Grazhdani za evropeysko razvitiye na Balgariya - Sayuz na demokraticnite sili - GERB** (Граждани за европейско развитие на България - Съюз на демократичните сили - ГЕРБ) and the anti-corruption **Coalition Prodalzhavame promyanata - Demokraticna Balgariya - PP-DB** (Продължаваме промяната - Демократична България - ПП-ДБ). Bulgaria witnessed multiple early parliamentary elections between 2021 and 2023, triggered by mass protests, government departures, and frequent resignations.

Bulgaria faces deep political divisions related to foreign relations and domestic politics,

with a noticeable split between pro-Western and pro-Russian sentiments. This divide has been exacerbated by differing responses to the COVID-19 pandemic and the conflict in Ukraine. Additionally, challenges such as low media literacy<sup>1</sup>, widespread online misinformation and hate speech contribute to Bulgaria's volatile political climate.

### Media landscape in Bulgaria

The media landscape in Bulgaria is diverse but faces challenges such as financial instability and political influence. Political and economic pressures heavily influence the media environment, with most local media remaining close to those in power. Public broadcasters historically cooperate with the government, while private media seek state-supported advertising. Foreign ownership of leading media players provides some editorial independence. Social media platforms like Viber and Telegram are gaining popularity. Media freedom is fragile, with independent media under pressure and concentrated ownership allowing widespread political influence. Positive developments include a reported reduction in government control of the press and improved ranking in the Press Freedom Index<sup>2</sup>. The media environment is strictly regulated during election campaigns, but the legal framework for online political advertising lacks clear rules for transparency.

1 Robert Schuman Centre (2023), *Monitoring Media Pluralism in the Digital Era - Country Report: Bulgaria*, European University Institute.

2 [2024 Reporters Without Borders World Press Freedom Index: Bulgaria.](#)



## *How significant is the role of social media and Facebook in political campaigns?*

The role of social media in Bulgarian political campaigns is becoming increasingly important, especially with the rise of populist party leaders. While social media plays a central role in sharing campaign messages and engaging with voters, traditional media, particularly television, remains the preferred source of political information for many Bulgarians. Campaigns allocate substantial funds to both TV ads and social media campaigns, balancing the use of online and offline strategies. Social media's advantages include targeted and interactive communication, but the lack of regulation in online political advertising poses challenges, raising concerns about the credibility of political messages.

Facebook is the dominant platform for political campaigns in Bulgaria. Political leaders often have more followers on their personal pages, emphasising the platform's importance in personalising political communication. Facebook is also the most preferred choice for political advertising. However, significant investments in Facebook also reveal a potential risk of spreading misleading messages, as seen in discussions surrounding societal divisions on issues like the 'spread of gender ideology' and the removal of the monument to the Soviet Army in Sofia.

## **II. 2024 Elections**

### *Results and tendencies*

In the recent European Parliament elections in Bulgaria, six political parties and coalitions won seats. The voter turnout increased by over 1% compared to the previous elections, reaching 33.78%. Some notable outcomes include the decrease in seats for the 'GERB-SDS' coalition and the '**Bulgarska sotsialisticheska partiy - BSP** (Българска социалистическа партия - БСП)', as well as the success of the new party '**Vazrazhdane**' in winning 3 seats. Additionally, the '**Dvizhenie za prava i svobodi - DPS** (Движение за права и свободи - ДПС)' and the coalition PP-DB maintained their seat numbers. The '**Ima takav narod - ITN** (Има такъв народ - ИТН)' party also secured 1 seat. Notably, the pro-Russian far-right party<sup>3</sup> **Vazrazhdane**, which didn't exist in the 2019 elections, won 3 seats, while VMRO, another Eurosceptic far-right party, failed to win seats. The Bulgarian Socialist Party (BSP) continued to lose electoral support, experiencing the largest drop in MEPs among all Bulgarian parties. No other political formation managed to win MEP seats.

### *Were the elections free and fair?*

The elections highlight a decrease in trust in the fairness of elections among Bulgarian society, as shown in a March 2024 Gallup

3 [Radio Free Europe Radio Liberty \(2021\), 'It Denies COVID And Wants Out Of NATO And The EU. Now Bulgaria's Pro-Kremlin, Far-Right Revival Party Is In Parliament', 22 November 2021.](#)



International survey<sup>4</sup>. It states that only 21% of Bulgarians believe that elections are free and fair, and just 13% believe that the country is governed according to the will of the people. While a majority still consider democracy to be the best form of government, trust in the basic principles of democracy has weakened in recent years, aligning Bulgaria with societies where trust in democratic governance has eroded.

### **The campaign**

The elections for the European Parliament and the national parliament in Bulgaria in 2024 were overshadowed by scandals of corruption and abuse of power<sup>5</sup> involving the parties of the last ruling coalition GERB-SDS and PP-DB. The election campaign focused less on the European Parliament and more on these scandals, with some discussions about recent anti-corruption reforms, Bulgaria's stance on the war in Ukraine, and further EU integration. The negative campaign led to voter passivity and deepened distrust and disillusionment among the electorate<sup>6</sup>.

### **Regulations about the funding of political ads**

The financing of political advertisements and election campaigns in Bulgaria is regulated by the Election Code of 2014<sup>7</sup> and the Political Parties Act of 2005<sup>8</sup>. The laws require transparency and set spending limits for campaigns, which can be financed by public and private sources. Parties that meet certain criteria receive public funding, and there are regulations for disclosing donations from individuals. However, there are concerns about potential influence from wealthy donors due to the lack of limits on individual donations. The expenses for the election campaign are capped for parties and independent candidates, and certain sources of donations are prohibited to preserve the integrity of the electoral process. Challenges remain despite efforts to ensure transparency, such as limited resources and powers for oversight, and the absence of regulations for third-party spending and political advertisements on social networks.

4 Gallup International (2024), *Democracy Remains Popular but People Worldwide are Questioning its Performance*, Gallup International.

5 Politico (2021), *'Bulgaria sinks under wave of pre-election scandals'*, 15 June 2021.

6 Bulgarian News Agency (2024), *PACE Delegation Says Despite Free and Competitive Voting, Bulgaria's Elections Marred by Voter Fatigue, Record Low Turnout*, 10 June 2024.

7 *Election Code of 2014*

8 *Political Parties Act of 2005*



### III. Description of data

The data used to compile these findings was collected through the WhoTargetsMe (WTM) browser extension. In Bulgaria, the extension was downloaded and used by 120 people during the election campaign, who voluntarily provided the data the app reported on them for the purposes of the study. The participants are not a representative sample of the Bulgarian population or Facebook users. The data we are analysing covers a three-month period before the elections on June 9, 2024 (March 10, 2024 – June 9, 2024).

The initial user data collected includes (self-declared) demographic information such as gender, age, and political preferences. Among the users who provided this data, there were 81 males, 36 females, and three people in the ‘other’ category. Regarding age groups, seven users were between 18-24, 28 users were between 25-34, 36 users were between 35-44, and 33 users were between 45-54. Additionally, 12 users fell in the 55-64 age group and four users were 65 or older. Aside from age and gender, users were also asked about their political affiliation on a scale of one to seven, with one representing “Very left-wing views” and seven representing “Very right-wing views”. The majority of users identified themselves as “Centre-Left” (34 users), followed by the “Very Right-Wing” group (33 users).

The users of WTM extension saw 128,252 views of ad content on Facebook, 3,446 of which were of political content, attributed to various parties participating in the European Parliament elections in Bulgaria. 545 unique

political ads were identified in the survey. In the dataset, the coalition PP-DB had the most views, followed by GERB-SDS, Vazrazhdane, and ITN. This study looks into the experience of the 120 users of the Who Targets Me extension and does not encompass the entire Facebook ad campaign.

### IV. Targeting

#### Expenditure

According to data from Open Parliament, the participants in the pre-election campaign for the National Assembly and the European Parliament spent a total of ₺2,689,163 (Bulgarian lev approx. €1,374,918 Euro) as of 12 June 2024. Two days before the campaign’s end, the participants spent a total of ₺2,528,822 (approx. €1,292,938 Euro) on advertising for both the EP and National Assembly elections as of 5 June 2024. Vazrazhdane lead in media advertising, while PP-DB seemed to focus more on Facebook advertising. Vazrazhdane tripled its advertising spending in the week before the writing of this report and has signed significant contracts with two major private television stations. ITN also has agreements with bTV and Nova TV, leading to a tenfold increase in their advertising costs compared to the first 20 days of the campaign.

During the study period, all parties collectively spent €405,212 on Facebook advertising, with 885 unique advertisers registered. As the two types of elections in Bulgaria – the EP and the NA – were combined, we can consider this





amount to be spent on a single campaign covering both elections. The highest spending day was 8 June, with an expenditure of €41,579. More than half of the total amount was spent by PP-DB, totalling €209,874, which is more than three times the amount spent by GERB-SDS. Following PP-DB in terms of spending on Facebook advertising is ITN, with a total expenditure of €52,291. Interestingly, it's not always the official pages of political parties that spend the most on advertising. In the case of PP-DB, the most money was spent by the official page of the party (€110,066), with second place being Radan Kanev (€7,155), followed by Iskren Mitev (€6,705), Andrey Tsekov (€5,365), and in fifth place Elisaveta Belogradova (€4,988). Among the election winners of GERB-SDS, Nikolay Rashkov spent the most money (€7,671), which is significantly more than the official pages, e.g. GERB-Sofia (€2,178) and GERB-Varna (€2,073). In second place is Georgi Valentinov Georgiev (€4,587), followed by Zhecho Stankov (€3,188), Todor Batkov (€2,988), and Daniel Mitov (€2,668). The situation with ITN is also notable, where the ads are concentrated on only two advertisers - Slavi Trifonov (€31,012) and the official page of the party (€21,279).

## V. Advertisers and ad targeting

In our dataset, the PP-DB coalition had 2,331 views across 307 unique ads, reaching 51 unique users, with an average of 7.6 views per ad. The GERB-SDS coalition achieved 330 views with 62 unique ads, reaching 20 users, and averaging 5.3 views per ad. Vazrazhdane

reached 176 views with 13 unique ads, averaging 13.5 views per ad and reaching 13 unique users. ITN, led by Slavi Trifonov, had 132 views with 21 unique ads, reaching 19 users and an average of 6.30 views per ad. BSP recorded 109 views with 32 unique ads, reaching 17 users and averaging 3.4 views per ad. The **VMRO-Bulgarian National Movement (VMRO-BND)** had 19 views with 5 unique ads, reaching five users, and an average of 3.8 views per ad. DPS had 11 views on 3 unique ads, reaching five users and averaging 3.7 views per ad. Other smaller parties, when grouped, accumulated 338 views with 102 unique ads, reaching 23 users.

Based on the data above, it's clear that PP-DB's political ads have received 2,331 views, which is more than twice the combined views of all other parties (1,062). This makes sense given the significant amount of Facebook advertising the coalition has invested in. Another notable point is the high ratio of views to the number of advertisements for Vazrazhdane. The party has opted for a strategy of fewer ads but more frequent exposure to users.

### Targeting

**Age:** When creating an ad on Facebook, advertisers have the option to target their ad to a specific age group. The maximum age that can be selected is 65+, while the minimum age is 13. However, it's observed that leading parties don't actively utilise age targeting. Most ads published target all ages, typically 18-53 years old. This indicates that parties generally don't tailor their messages to the specific age groups of Facebook users.



**Gender:** We have observed 22 views of nine unique ads targeting women, all of which are from PP-DB. Five of these ads feature Elisaveta Belobradova. The topics of these ads mainly revolve around violence against women and children's health. None of the ads specifically target a male audience, with a few minor exceptions that are not of particular interest. Based on this analysis, we can conclude that gender targeting is not frequently utilised by political parties in their advertisements.

**Interests:** We found 20 unique ads targeted based on interests. Political parties use interests like 'Politics', 'Current Affairs', 'Government', and 'Social Affairs' to reach politically active users. PP-DB, GERB, and BSP used interests such as 'Health Policy', 'Education', and 'European Union'. 'Business and finance' was used by GERB, while 'Bulgaria' and 'History' were used by Vazrazhdane.

**Custom audiences:** The study observed 567 views on 60 ads, targeted using Custom Audiences and created based on interactions with specific sites, such as official pages of relevant political parties. The PP-DB utilised this targeting method most frequently, achieving 486 views across 53 ads. In contrast, GERB-SDS only used it in one ad, reaching 52 views, while Resurgence employed this method in three ads. Additionally, the PP-DB exclusively utilised this approach in 14 of their ads.

**Lookalike audiences:** This way of targeting is less used than the previous one. We observe its use in 41 ads that reached 270 views. Almost all of these ads are from PP-DB. Vazrazhdane

used a lookalike audience only in one of their ads featured in our database.

## VI. Regulation and compliance

### Regulatory environment

Political advertising on social networks in Bulgaria is not explicitly regulated in national legislation, but is instead subject to European legislation. In particular, the General Data Protection Regulation (GDPR) governs the use of personal data in political advertising services, regulating targeting and ad delivery techniques. The Personal Data Protection Act (PDPA) incorporates some GDPR requirements into national legislation and establishes the Commission for the Protection of Personal Data as a supervisory authority. Additionally, Regulation (EU) 2022/2065 (Digital Services Act) regulates certain targeting techniques and ad delivery for political advertising by large online platforms and search engines. The Electronic Communications Act ensures the implementation of these regulations in national legislation and provides mechanisms for supervision, cooperation, and enforcement at the national level. These regulations apply to all types of online advertising, including commercial and political ads. Bulgaria will apply Regulation (EU) 2024/900 regarding the transparency and targeting of political advertising starting from 10 October 2025.

The national legislation provides for supervision of media service providers, polling and



advertising agencies, and public relations agencies that provide services to political parties, coalitions, and initiative committees. The Central Election Commission and the Audit Chamber have been granted powers to supervise these activities. The Electoral Code establishes a public register of parties, coalitions, and initiative committees, which includes information about the media service providers they work with. The media service providers are obliged to provide information about the services they provide to the relevant authorities. The Central Election Commission is responsible for controlling compliance with the Electoral Code and supervising the pre-election campaign by media service providers with a national scope. It can request information from the Electronic Media Council to carry out this control.

The Electoral Code contains provisions for the provision of media services to political parties, coalitions, and initiative committees, as well as for the coverage of the election campaign by commercial electronic media. Media service providers are required to separate paid content related to the election campaign with a visual, sound, or audio-visual sign (hereinafter ‘marking requirement’). They are also obliged to announce information about contracts, including non-remunerated contracts, concluded with the parties, coalitions, and initiative committees. Property sanctions are provided for media service providers in case of non-fulfilment of obligations - between JIB2000 and JIB5000 (approx. €1000-2500) and JIB5000-10,000 (2500-5000 euros) when the offence is repeated. The definition of ‘media service’ includes print media, media distributed

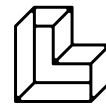
through electronic communication networks, and online news services, but excludes social networks and personal blogs. A ‘media service provider’ is defined as a natural person or a legal entity with editorial responsibility for the selection of content and effective control over program schemes and services provided.

Thus, in practice, political advertising in social networks remains outside the scope of the above-described control procedures provided for in the Electoral Code, unless it is carried out from the profile of a print or online media in social networks.

### Compliance

Keeping in mind the lack of explicit national legislation regarding political advertising on social networks, political parties often follow the advertising rules set by social networks themselves, especially during official election campaigns. Unofficial pages and groups are more likely to break those rules and post political advertising without marking it as such. Due to the absence of explicit legal regulation at the national level, a large portion of political messages on social networks are not labelled as political advertising and are difficult to trace in terms of targeting and delivery techniques. European legislation binds social networks regarding political advertising, but national laws lack specific requirements regarding transparency in the distribution of political advertisements on social networks, leading to a lack of control mechanisms.

Targeting techniques and techniques for delivering political ads on social networks are



regulated by the GDPR. Supervisory authorities are competent to consider complaints and possible violations of the regulation, especially if the case significantly affects data subjects in a specific member state. In the context of violations related to the distribution of political advertisements targeting citizens of Bulgaria, the CPLD is the competent authority to consider complaints and reports. However, we know of no cases of checks on social networks by the CPLD related to political advertising.

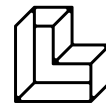
## **VII. Recommendations**

The Electoral Code's interpretation excludes social networks from specialised control over political advertising, except for those done by social media profiles of printed or online media, meaning that political advertising on social networks falls outside the scope of control. As a result, the Central Electoral Commission consistently rejects complaints and reports of violations related to political advertising services on social networks, including violations of marking requirements, language requirements, campaign silence, and lack of transparency regarding financing and authorship of political messages.

The wording of §1, item 15 of the Additional Provisions of the Electoral Code creates ambiguity and confusion. While it defines 'media service' as the creation and distribution of information and content intended for a significant audience, it also lists specific media sources and means of distribution, excluding social networks. In our view, a clear distinction should be made between 'media service',

'media service provider', 'media service distributor', and 'media service transmission and distribution means and technologies', as outlined in applicable European legislation.

We believe that social networks, as broadcasters of media services, should fall under the scope of the Electoral Code. The CEC, responsible for ensuring compliance with electoral legislation, should have enforcement powers over political advertising on social networks.



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## Contacts

### Bulgarian Helsinki Committee

The Bulgarian Helsinki Committee (BHC) is an independent non-governmental organisation for the protection of human rights, established in Sofia, Bulgaria in 1992. The objectives of the BHC are to promote respect for the human rights of every individual; to stimulate legislative reform to bring Bulgarian legislation in line with international human rights standards; to trigger public debate on human rights issues; to carry out advocacy for the protection of human rights; and to popularise and make widely available human rights instruments.

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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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