



## Hungary's Online Political Advertising Market in Transition

Phase III Monitoring Brief for the European Commission

21 February 2026 – 11 April 2026

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### Executive Summary

This Phase III monitoring brief reviews developments in Hungary's online political environment during the official campaign for the 12 April 2026 parliamentary elections. It examines how **political influence shifted** across Meta's services, TikTok, and YouTube **after major platforms suspended political advertising** in the EU in response to Regulation (EU) 2024/900 on the transparency and targeting of political advertising ([TTPA](#)), and considers the enforcement implications under both the TTPA and the Digital Services Act ([DSA](#)).

The evidence confirms earlier findings: removing formal political advertising channels did not reduce online attempts to influence voters. Instead, influence shifted to **less transparent methods**, including undeclared political advertising, proxy pages, coordinated inauthentic behaviour, and paid influencer outreach outside standard systems. This indicates **widespread sponsor non-compliance** with TTPA transparency obligations and inadequate platform responses to circumvention of political advertising bans.

Meta provides the clearest example. Investigative reporting shows that the **same actors**, or closely connected pages, repeatedly launched **large volumes of political ads**. Meta later removed many as political, but did not escalate enforcement at the page or account level. As a result, repeat offenders could continue testing the system, spending on the platform, and reaching large audiences, while those complying with the ban were disadvantaged. The post-ban environment also offered less transparency than before. This combination of weak enforcement and reduced traceability does not align with the Commission's [DSA electoral-process guidance](#), which calls for **effective mitigation** against manipulation and other electoral risks.

TikTok presents a different situation. Its disclosures indicate significant removals of election-rule-violating videos, impersonation accounts, and coordinated networks. Unlike Meta, TikTok has long banned paid political advertising and treats compensated creator support for or opposition to political actors as political advertising. Phase III evidence suggests the main risk on TikTok was **covert influencer outreach** and coordinated inauthentic amplification, rather than large-scale misrepresented political ads. However, this should be interpreted with caution, as TikTok is **difficult to scrutinise externally** and its transparency tools are not well-suited for independent monitoring. The lack of publicly documented cases may reflect either effective enforcement or limited external visibility.

A similar caution applies to YouTube. No detailed public evidence was found in Hungarian reporting of systematic circumvention on YouTube at the scale seen on Meta. This does not prove absence. Google's decision to stop serving political advertising in the EU, including on YouTube, and not feature ban-breaching ads in its repository significantly **reduced the material available for external scrutiny**. At present, evidence is insufficient to draw conclusions about activity on YouTube.



During the official campaign period, Hungary still **lacked an operational TTPA enforcement** authority. As a result, sponsor-side breaches involving undeclared political advertising were not meaningfully enforceable at the national level.

At the platform level, the patterns documented in this brief raise **serious questions about whether the platforms had effective, proportionate, and adequately targeted mitigation measures** in response to foreseeable electoral risks. It is for the Commission to determine whether these findings warrant closer scrutiny, further engagement with the platforms, or enforcement action. This brief aims to support that assessment by documenting how these risks materialised during the campaign period.

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## 1. Purpose and scope

This brief follows Liberties' November 2025 [Phase I brief](#) on the immediate TTPA effect and its March 2026 [Phase II brief](#) on the pre-campaign period. Phase III **covers the official campaign period from 21 February to 11 April 2026** and addresses three questions: whether internal political advertising bans were enforced effectively; whether meaningful transparency and traceability were preserved after those bans; and how political actors adapted their mobilisation, amplification, and influence strategies once repository-visible political advertising became harder to use. The assessment is based on reporting and analysis by Political Capital, Lakmusz, Telex, 444, and HVG, as well as official platform materials.

## 2. Developments carried over from Phases I and II

Phases I and II showed that the ad bans introduced by Meta and Google did not eliminate online political influence. Instead, **influence shifted to less visible, less accountable channels**. On Meta, this included unlabeled paid political content, proxy pages, AI-generated campaign materials framed as nonpolitical, and follower-recruitment or data-collection campaigns outside political-ad classification. On Google, the withdrawal from EU political advertising significantly reduced the utility of public ad-transparency tools for real-time scrutiny. This resulted in a [weaker evidentiary environment](#), just as electoral-risk mitigation became increasingly important with the rise of synthetic content production.

## 3. Facebook and Instagram (Meta)

### 3.1 Repeated violations without meaningful escalation

Phase III reinforces the conclusion that **repeated infringement of Meta's political advertising ban was not met with meaningful account- or page-level consequences**. On 26 March 2025, Political Capital reported that, since Meta's 6 October 2025 suspension of political, electoral, and social issue advertising in the EU, the Megafon-linked Nemzeti Ellenállás Mozgalom ([NEM](#)) launched 183 political ads on Meta's services. Meta later classified 84% of them as political, but only after many had already achieved substantial reach. Political Capital estimated minimum spending at HUF 73 million (approximately 200,000 EUR) and described a pattern in which ads were repeatedly resubmitted after removal, with minor changes to test system limits. The key enforcement issue is that Meta removed many individual ads, but the evidence does not show effective escalation against the repeat offender.

This is significant under the DSA electoral-process framework. The Commission's guidelines do not consider a political-ad ban risk-neutral. When the same actors repeatedly launch prohibited political ads and continue advertising with only ad-by-ad takedowns, the mitigation response appears insufficient.

### 3.2 Proxy pages and candidate-linked advertising over extended periods

Phase III also shows that **proxy pages continued to run constituency-level political advertising for extended periods**, particularly in Pest 5, the constituency of Justice Minister Tuzson Bence. [Lakmusz](#) and [Political Capital](#) documented a cluster of pages, including *TZSN*, *Ma is tanultál valamit*, and *Társágünk hírei*, that promoted Tuzson or his campaign themes in local-information or quasi-civic formats. Pages supporting Tuzson's campaign, including his official page, launched hundreds of ads since the post-ban period began and continued to do so despite widespread media coverage.

This raises two concerns. First, Meta's enforcement appears insufficient: actions against individual ads **did not result in a profile-level ban or a lasting disruption of the broader page ecosystem supporting the same candidate**. Second, the cases reveal a policy inconsistency. Meta publicly stated that politicians, candidates, and officeholders in the EU could post political content organically, but could not amplify it through paid advertising. The Pest 5 cases show that, in practice, candidate-linked and candidate-benefiting paid amplification remained possible for months. At a minimum, these cases raise serious questions about whether Meta had effective mechanisms to prevent repeated candidate-linked paid political promotion.

### 3.3 Weak sponsor verification and deceptive sponsor identities

Phase III also highlights **weaknesses in sponsor verification**. Lakmusz [reported](#) that a Facebook profile created on 30 March 2026 under the name "Spingler Károly," using the image of a Russian businessman, quickly launched at least 34 ads promoting pro-government narratives and anti-Tisza content. The ads reportedly cost over HUF 1.89 million (approximately 5,000 EUR) within days. Meta removed many of them, but not before at least 6.8 million users saw them. This episode is significant not only because of the reach achieved, but because it suggests that clearly suspicious identity signals did not prevent substantial exposure.

The same broader issue appears in **false-flag campaigning**. Lakmusz and Political Capital [documented](#) pages such as *Kutyakalandok* and *Tiszta Jövőt!* that used opposition-style branding and AI-generated videos to promote MKKP and DK candidates against the Tisza candidate in Pest 5, even though the parties themselves denied any connection.

The core enforcement question is whether advertiser identity and beneficial sponsorship are being verified in a way that is meaningful for electoral-risk mitigation, rather than only formal enough to permit ad submission.

### 3.4 Change of tactics: coordinated inauthentic behaviour

On 10 March 2026, Telex [reported](#) that **a trollfarm-linked advertising network** connected to the broader pro-government ecosystem had used fake or pseudonymous accounts to manipulate Facebook's recommender system and later also to run ad campaigns. The alleged sponsor of some ads denied involvement.

Once a platform bans formal political advertising, it should assess whether political influence is shifting into adjacent channels, including coordinated inauthentic behaviour, fake engagement, proxy amplification, and deceptive sponsorship, and adapt its mitigation measures accordingly. The Hungarian campaign suggests this shift was foreseeable and significant, yet it remains unclear whether Meta had mitigation measures capable of addressing it effectively.

### 3.5 AI-generated content as a mainstream campaign technique

Phase III further confirms that **AI-generated and synthetic political content became a routine campaign tool**. Lakmusz [documented](#) the use of AI-generated attack videos, manipulated images, and synthetic narratives in pro-government campaigning and proxy networks. Synthetic material can be produced cost-effectively in forms less likely to trigger traditional political-ad classifiers, while still conveying clear electoral messaging.



The Commission's DSA electoral-process guidelines are directly relevant here. They identify generative AI as a distinct electoral-risk vector and indicate that very large online platforms should adapt their risk-mitigation measures accordingly to protect electoral processes. The Hungarian campaign suggests synthetic materials had become a standard part of the campaign toolkit, but it remains unclear what, and how efficient, platform-level mitigation measures were introduced in response.

#### 4. TikTok

TikTok presents a different picture from Meta. The platform publicly [reported](#) a ban on paid political advertising, including compensated creator support for or opposition to political actors, as well as enforcement against election-rule violations, impersonation accounts, and coordinated networks. **Limited public evidence suggests** that many **attempts were made to circumvent these rules**, including through paid outreach to [micro-influencers](#). However, such cases do not necessarily indicate ineffective enforcement. Instead, they show that some influence techniques operate outside conventional advertising formats and are inherently difficult to detect.

What remains unclear is whether there were broader attempts to place political advertisements on TikTok and, if so, whether they were effectively blocked or simply not captured by external scrutiny. Because TikTok's **transparency systems are poorly suited to independent monitoring**, the relative absence of publicly documented cases cannot be interpreted with confidence. It may reflect effective enforcement, limited attempts to use the platform for such advertising, or simply the platform's low external observability.

#### 5. YouTube

In Phase III, no comparably detailed public evidence was found in Hungarian campaign reporting of systematic circumvention on YouTube similar to the cases documented on Meta. This should not be taken as evidence that the platform was unaffected. As noted in Phase II, even when researchers identify likely violators or suspect accounts, it is **nearly impossible to reconstruct what content was disseminated** once Google removes policy-violating material from the Ad Transparency Centre. This makes systematic scrutiny of the platform exceptionally difficult and a poor use of limited investigative resources. The relative absence of public reporting may therefore reflect weak observability rather than low incidence.

#### 6. Conclusion and recommendations

The three monitoring phases reveal a consistent pattern. In Hungary, the suspension of political advertising by major platforms shifted paid political influence into less transparent forms. In order to address this issue, the Civil Liberties Union for Europe recommends:

##### For the TTPA team

The Hungarian case reinforces the importance of **building the [TTPA repository quickly](#) and [designing it for effective oversight](#)**. The repository should support scrutiny of in-scope political advertising across the full enforcement chain, including ads that are later removed, rejected, or reclassified after publication or detection. Otherwise, transparency will be lost in the cases that matter most.



In parallel, the Commission should urge Member States to **complete the national enforcement architecture** required under the Regulation, including the designation of competent authorities and effective sanctioning regimes. Without functioning domestic enforcement, the repository will improve visibility but not necessarily compliance.

#### For the DSA team

The findings support **closer scrutiny of whether very large platforms are [adequately assessing and mitigating electoral risks](#) that persist outside formal political-ad categories.** The key issue is not whether platforms host or ban political ads, but whether their systems account for the predictable migration of influence activity into alternative forms.

For Meta in particular, the Commission should examine **why enforcement remains too ad-specific and reactive.** The pattern observed in Hungary suggests Meta avoided advertiser, page, and network-level interventions; prior enforcement actions were not reused, and repeat circumvention by connected actors was treated as a series of isolated violations.

The Commission should also assess whether the transparency provided by TikTok and YouTube is sufficient to support appropriate risk mitigation and regulatory oversight.

#### For the DFA team

The monitoring also identifies a regulatory gap not well addressed by either the DSA or the TTPA concerning [monetised political influencing](#). When political messaging is disseminated through influencers, it falls outside conventional ad libraries, and transparency on who earns from such messaging becomes much weaker.

The Commission should consider whether the Digital Fairness Act can **address monetised political influencing more directly.** This could include a dedicated transparency mechanism or repository for paid influencer content, including political as a sub-category, and for monetised content, where it would be possible to see whether platforms financially support certain channels. This would help address a growing area of influence activity that falls between consumer protection, platform governance, and electoral integrity.

## CONTACT

### Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a Berlin-based civil liberties group with 24 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.

Transparency register number:  
544892227334-39

c/o Publix Hermannstraße 90  
12051 Berlin, Germany  
[www.liberties.eu](http://www.liberties.eu)  
[info@liberties.eu](mailto:info@liberties.eu)