



Annual Report 2019

—

For a fair and open digital environment

TABLE

CONTENTS

\ Foreword	06
\ 01 Who we are	08
\ Vision	09
\ Mission	09
\ Brussels Office	09
\ 02 Our network	10
\ Strategy	11
\ Common campaigning guidance for the network	11
\ Capacity building training sessions for members on fundraising	11
\ 2019 membership map	12
\ 03 Our impact in 2019	14
\ 3.1. Open internet and inclusive technologies	15
\ Regulation of Artificial Intelligence (AI)	15
\ Equal access to all internet content and services (Net Neutrality)	16
\ Enabling inclusive technologies	16
\ Sustainability of digital technologies	18

OF MENTS

▾ 3.2. Privacy and data protection	20
▾ Ensuring enforcement of European data protection standards (GDPR)	20
▾ Regulation of sensitive biometric data	21
▾ Advocate for privacy and confidentiality	21
▾ Challenge surveillance and data retention	22
▾ Protect against unlawful and discriminatory profiling practices	23
▾ 3.3 Information democracy	24
▾ Freedom of expression and content moderation	24
▾ Promotion of alternatives to dominant online services, hardware and software	30
▾ Reforming the online tracking advertising industry (AdTech)	31
▾ Tackling disinformation and interference in electoral campaigns	32
▾ Promoting digital rights in trade agreements	32
▾ 04 Our finances	33
▾ 4.1. Income	34
▾ 4.2. Expenditure	36

FOREWORD

Many cycles came to an end in 2019 within the European Union. Far-right parties grew steadily in several Member States, but did not do as well as foreseen in the European Parliament elections. Brexit took a toll - both on the UK and in the EU bubble - fundamentally changing the European Parliament landscape. It became clear to many that the internet and digitalisation can radically affect our elections, democracies and economic systems.

After the terrorist attack on a mosque in New Zealand in 2019, governments and private organisations around the world responded with policies to address terrorist and illegal content online. At EU level, EDRI led civil society engagement on the proposed terrorist content Regulation.

While recognising the impact of online content on real-life violence, we want to make sure that responses do not lead to curbing the free expression of groups at risk, marginalised due to their political, human rights, research, artistic or religious affiliations.

WORD

Content moderation was another topic at the heart of the discussions on the reform of the Copyright laws in the EU. EDRi and its partners led the SaveYourInternet.eu campaign against upload filters – or automated user censorship tools - ahead of the European Parliament plenary on the Copyright Directive.

Tragically, the final vote was lost by a margin of only 5 votes - with 13 members of the European Parliament mistakenly pressing the wrong option during the key vote. It became clear to many that the internet and digitalisation can radically affect our elections, democracies and economic systems. And it became clear to many that organisations such as ours, and our members, watch-dogs for human rights in the digital environment, have an increasingly important role in safeguard citizen's rights and freedoms.

2019 has also been a pivotal year, with more attempts to rein in the power of dominant internet platforms. Our members Europe-wide have continued highlighting the privacy-invasive surveillance-based business models of the digital platforms dominating the online market, and the significant consequences this may have for civil rights and control of society.

Based on a complaint from nyob (Austria) and Quadrature du Net (France), the French Data Protection Authority issued a EUR 50 million fine on Google for violating the GDPR. Complaints against the online advertising industry based on misuse of data multiplied in 2019, filed by many EDRi members across Europe.

Finally, 2019 was the final year of EDRi's four-year strategy cycle. We have made progress in listening to our community's voices urging us to invest more in joint work and capacity. **Now, we are more equipped than ever to build a resilient, sustainable movement of digital rights organisations holding those in power to account for violations of our online liberties.**

Anna Fielder, EDRi President
Claire Fernandez, EDRi Executive Director

01

Who we are

The EDRI (European Digital Rights) network is a dynamic collective of 44+ NGOs, experts, advocates and academics working to defend and advance digital rights across Europe.



▾ Vision

We see a world in which **people live with dignity and vitality in the digital age**. We want to create a fair and open digital environment that enables everyone to flourish and thrive to their fullest potential.

▾ Mission

Our mission is to challenge private and state actors who abuse their power to control and manipulate us. We do so by advocating for robust and enforced laws, informing and mobilising people, promoting a healthy and accountable technology market and building a movement of organisations and individuals committed to digital rights and freedoms in a connected world.

▾ Brussels office (as of September 2020)

Claire Fernandez - *Executive Director*

Diego Naranjo - *Head of Policy*

Sarah Chander - *Senior Policy Advisor*

Jan Penfrat - *Senior Policy Advisor*

Chloé Berthélémy - *Policy Advisor*

Ella Jakubowska - *Policy and Campaigns Officer*

Guillermo Peris - *Community Coordinator*

Gail Rego - *Senior Communications and Media Manager*

Andreea Belu - *Campaigns and Communications Manager*

Katarína Bartovičová - *Fundraising Manager*

Jean Duclos - *Finance and Administration Officer*

A special thanks to previous team members who supported our efforts in 2019: **Claire Ivers** (Interim Executive Director), **Heini Järvinen** (Senior Communications Manager) and **Laureline Lemoine** (Policy Advisor).

We do so by advocating for robust and enforced laws, informing and mobilising people, promoting a healthy and accountable technology market and building a movement of organisations and individuals committed to digital rights and freedoms in a connected world.



02

Our network

EDRI is the biggest European network defending rights and freedoms online. We had 42 members in 2019 who closely contributed to our work. Since then the EDRI network has grown to 44 organisations from 21 countries and dozens of observers.

We held more than 50 consultations within and outside the network, ran two member surveys and held a strategic workshop at the General Assembly.

▾ Strategy

In March, we commenced a year-long journey of consultations and reflections to develop our new 2020-2024 plan for EDRI to remain the leading network of NGOs in Europe defending human rights and freedoms in the digital age. We committed to a transparent, consultative and inclusive process to define the network's theory of change, grounded in our past achievements and addressing structural online abuses with consequences for all. We looked at the context and the problems that needed to be addressed focusing on who holds the power and how can we change the status quo.

We held more than 50 consultations within and outside the network, ran two member surveys and held a strategic workshop at the General Assembly.

▾ Common campaigning guidance for the network

Based on two EDRI campaigner summits and several calls, the office is working on developing a campaign prototype which will empower our members to run simple campaigns at the national level along with integrating fundraising activities.

▾ Capacity building training session for members on fundraising

We organised a professional fundraising training for EDRI network members attended by representatives of 14 member organisations. The training was focused on individual and corporate fundraising and was led by two renowned fundraising trainers. The training included sessions on fundraising best practices and successes from EDRI members, as well as a round table discussions on grant and institutional fundraising.

The training received very positive feedback and laid the foundation for further cooperation on fundraising within the EDRI network.

EDRi welcomed 3 new members: EPIC (Electronic Privacy Information Centre), GFF (Gesellschaft Für Freiheitsrechte) and Index on Censorship as well as 5 new observers to the network.

EFF (Electronic Frontier Foundation) hired Brussels policy expert, Christoph Schmon, and noted Icelandic lawmaker and activist, Birgitta Jónsdóttir, to lead and inspire their international work, especially at the heart of the European Union.



Map represents membership as of 2019.

International:

- EFF
- PI
- ARTICLE 19
- epic.org

European:

- accessnow
- fsfe
- noyb

Countries with:

- EDRi Members



BITS OF FREEDOM

VRIJSCHRIFT



digitalcourage



03

Our impact in 2019

EDRI members and the Brussels Office work on a spectrum of topics. At European and national levels, the network uses a combination of policy and advocacy work, campaigns, communications and litigation to achieve its goals.

3.1 Open internet and inclusive technologies

EDRI joins a movement for a sustainable open internet and for technologies that work for the greater good.

Regulation of Artificial Intelligence (AI)

In 2019, the European Commission committed to six essential objectives, one of which was to ensure that Europe is “fit for the digital age”, confirming that EDRI’s work on digital rights is needed now more than ever. The positive work of the EDRI network was essential to the development of building blocks for future regulation related to AI, biometrics and protecting citizens from new legislative initiatives with an impact on our privacy.

The Brussels office also welcomed the **Mozilla Open Web Fellow, Petra Molnar**, who focuses on the use of technologies at the border – including the controversial EU migration “lie detector” project, iBorderCtrl. The team’s outreach with the European Parliament towards establishing an intergroup on digital rights also paid off, with an **AI and Digital intergroup**¹ announced at the end of 2019.

Member Highlights

Human Rights Implications

In August 2019, Access Now and the Wikimedia Foundation submitted joint comments on the Council of Europe expert committee’s draft recommendations on the human rights impacts of algorithmic systems. The report² by the committee of experts was finalised in 2019 and the Committee of Ministers adopted the recommendations in April 2020.



-

In August, The Times scooped the plans of the European Commission to regulate face recognition technology³ and a day later The Express reported on the “significant risk” for citizens if such a technology is deployed without proper oversight.⁴

¹ <https://europarl.europa.eu/about-parliament/files/organisation-and-rules/organisation/intergroups/legislative-list-of-member-artificial-intelligence-and-digital.pdf>

² <https://hcav.am/en/recommendation-coe/>

³ <https://www.thetimes.co.uk/article/eu-plans-clampdown-on-facial-recognition-jgvtf0882>

⁴ <https://www.express.co.uk/news/politics/1169806/eu-news-facial-recognition-technology-curbed-european-commission-report>

Equal access to all internet content and services (Net Neutrality)

In April 2019, EDRi and 31 human and civil rights organisations addressed an open letter to the EU Commission and the Body of European Regulators for Electronic Communications (BEREC) to criticise the lack of enforcement of current Net Neutrality rules in Europe. The signatories also emphasised that the EU needs to act urgently against the widespread use of zero-rating practices.

Zero-rating favours internet traffic from certain companies or content providers by billing it to customers at a lower (zero) rate while discriminating against everybody else.

Enabling inclusive technologies

Online and data-driven discrimination have revealed that groups already experiencing societal inequalities are often most affected by violations of privacy and personal data protection. Human rights activists and defenders, too, have suffered disproportionate risks to their privacy due to the challenge they pose to government power.

All of this has re-ignited an interest in how the digital rights community can ensure that our demands contribute to respect for and protection of all people, and are mindful of how the impacts of technology may be different on different groups and causes.

From speaking at the PES Women Annual Conference and participating in Parliamentary events on **non-discrimination in technology**, to providing input into the OSEPI/BEUC report on a human-centric digital agenda, EDRi has raised the profile of digital rights in areas not typically associated with privacy and data protection.

⁵ <https://www.tbid.org.tr/blog-tr/tbid-ve-altbilden-cinsiyetci-dijital-siddette-mucadele-rehberi/>

⁶ <https://xnet-x.net/xnet-registra-primera-ley-alertadores-ue/>

⁷ <https://xnet-x.net/xnet-primera-transposicion-ley-alertadores-whistleblowers-denunciantes/>

⁸ <https://www.globaleaks.org/>

⁹ <https://www.whistleblowingfund.org>

Member Highlights

Net Neutrality in danger

epicenter.works, in cooperation with the Austrian Chamber of Labour, presented a study that inspected the websites of 225 mobile services over a period of 4 months, uncovering 186 Net Neutrality violations. These revelations were discussed by over 30 media in 15 countries.

Fighting gender violence online in Turkey

Alternatif Bilişim organised a [workshop](#)⁵ entitled "Joining Forces against gendered-violence online" with the participation of activists, journalists and rights defenders.

Whistleblower protection

Xnet submitted amendments to the **EU Whistleblower Directive** pushing [for the first transposition legislation](#)⁶ in Europe of the Directive, which has been [registered at the Spanish Parliament](#).⁷

Hermes Center, together with 9 organisations, launched the Expanding Anonymous Tipping (**EAT**) project. EAT's goal is to provide ways of whistleblowing against corruption through a guaranteed anonymous and secure mechanism provided by [GlobalLeaks](#).⁸

Hermes Center and **Renewable Freedom Foundation** launched the second round of [The Digital Whistleblowing Fund](#)⁹, funding European projects reporting on "gender-based violence, the rights of minorities, migrants and refugees".

In 2019...

**We were featured
by more than 210
press and media.
Gained 3424 Twitter
followers, engaging
a more than 21k.
Informed over half
a million unique
visitors through our
website.**

The Brussels office also met with representatives of PICUM (Platform for International Cooperation on Undocumented Migrants) to consider privacy regulation and its impacts on migrants. We also met with Trade Union representatives in view of the Commission's plans to review labour rights, in particular the exploitation of platform workers.

The Brussels office has also sought to make technology more inclusive by driving the idea of interoperability between data, platforms and services. These efforts included meeting with representatives of the European Commission assessing the feasibility of such measures and publishing a series of short animations¹⁰ across a wide range of digital rights topics.

¹⁰ <https://youtu.be/afYVNHDLTMc>

▾ Sustainability of digital technologies

From the enormous emissions caused by data centers – showing that mass data gathering and storage is not just intrusive, but environmentally unsustainable – to the waste from the mass consumption of electrical devices, digital sustainability has become a priority for a world facing a climate crisis.

Combined with the human and ecological exploitation occurring across technology supply chains, it has made clear that the EU has a normative responsibility to protect not only EU citizens, but people around the world, who are suffering at the hands of Europe's exponential digital growth and consumption.

We explored the **synergies between environmental and digital rights movements.**





Privacy Camp

The seventh annual Privacy Camp conference took place in Brussels in January 2019, bringing together over 230 representatives from civil society, policy and academia to discuss existing and looming problems for human rights in the digital environment. In the face of a “shrinking civic space” for collective action, the event provided a platform to discuss and develop shared principles to address key challenges for digital rights and the freedoms of individuals.

In addition, Privacy Camp 2019 hosted the Civil Society Summit of the European Data Protection Supervisor (EDPS) for the second consecutive year.

Privacy Camp was organised in cooperation with the Computers, Privacy and Data Protection conference (CPDP), Privacy Salon, USL-B Institute for European Studies, and Vrije Universiteit Brussel – Law, Science, Technology & Society Studies, Université Saint-Louis Brussels, and with the support of our partners EDPS, Mozilla, Council of European National Top-Level Domain Registries (CENTR), The Swedish Internet Foundation and Electronic Privacy Information Center (EPIC).

The event provided a platform to discuss and develop shared principles to address key challenges for digital rights and the freedoms of individuals.



3.2 Privacy and data protection

EDRI combats government and commercial mass surveillance.

Ensuring enforcement of European data protection standards (GDPR)

In an increasingly interconnected environment, our work and expertise in the era of privacy and data protection are key to protect individuals and communities. Since May 2018, the EU has led personal data protection efforts with the establishment of the General Data Protection Regulation (GDPR). By the end of 2019, all Member States had implemented the GDPR into their national legislation.

EDRI and its members have continued to monitor the implementation of the GDPR to ensure that its rights and protections are effectively delivered to data subjects across the EU. We pushed for the its implementation in the remaining Member States and denounced national implementation measures contradicting the legislation's spirit and objectives. In June, we launched the last issue of the **GDPR Today anniversary edition**.¹¹

We shared our recommendations at various panels and held our final meeting on the Fundamental Rights Review Project (a study commissioned by the European Parliament on data collection instruments) which was published in December.

We also participated in the International Working Group on Data protection and Telecommunications (IWGDPT aka Berlin Group).

¹¹ <https://www.gdprtoday.org/issue/no-4-11-june-2019-gdpr-anniversary-edition/>

¹² <https://www.mydatadoneright.eu>

¹³ <https://www.politico.eu/article/top-eu-court-rules-websites-must-seek-explicit-consent-for-personal-data/>

Member Highlights

GDPR done right

Access Now published their first yearly report on the application of the GDPR in May 2019, highlighting shortcomings in implementation and enforcement at national level and providing recommendations to authorities and the European Commission.

Bits of Freedom formed a European coalition of organisations that helped residents make the most of their rights under the GDPR with the online tool [My Data Done Right](#).¹²

Metamorphosis Foundation was invited by North Macedonia's Ministry of Justice to nominate a member of the working group on the creation of the new Law on Personal Data Protection, consistent to the GDPR.



-
Court of Justice of the European Union rules that websites must obtain explicit consent from users in order to collect their personal data.

*From @PoliticoEurope
Full tweet and article [here](#).¹³*

▾ Regulation of sensitive biometric data

2019 also marked the beginning of the Brussels office's involvement in AI, facial recognition and biometrics. This culminated in a series of blog posts on facial recognition and other biometric identification and surveillance technologies in order to demonstrate why they are core fundamental rights issues.

The articles gained attention from NGOs, universities, media outlets and MEPs, demonstrating EDRI's thought leadership on these emerging digital rights challenges.

▾ Advocate for privacy and confidentiality

EDRI also led advocacy on the ePrivacy reform - EU rules governing the privacy and confidentiality of electronic communications. EDRI has contributed to the negotiations in the Council to ensure that civil society views were being taken on board by Member States, for the last two years.

In November, the Council failed to reach a majority leaving the door open for EDRI to push Member States to promote a strong privacy framework which complements the GDPR. EDRI has also advocated for the new text to ensure privacy by design and by default, protect communications in transit and when stored, ban tracking walls, prevent backdoors to scan private communications without a court order, and avoid secondary processing of communications data without consent.

Member Highlights

—

Don't tag your friends

SHARE Foundation, together with two other civil society organisations, published a detailed analysis of the Serbian Ministry of Interior's Data Protection Impact Assessment (DPIA) on the use of smart video surveillance cameras with facial recognition capabilities in Belgrade. It concluded that the document did not meet the formal or material conditions required by the Law on Personal Data Protection in Serbia. The Commissioner on Personal Data Protection in Serbia also published his opinion on the DPIA, **confirming the findings of SHARE** and its partners.

Bits of Freedom's concerns about the **police's facial recognition database** ("CATCH") made national media, and their research into the possibilities of facial recognition in public space was published by one of the largest national **newspapers in the Netherlands**.

—

I know what you did last summer

Liga voor Mensenrechten developed a [chat bot app](https://privacyapp.mensenrechten.be)¹⁴ to inform people about how much data the government has about them. Launched as part of Liga's campaign towards the federal and regional elections of May 2019, users could send an email to political parties asking them to be mindful of their privacy. The app had over 14,600 visitors with 750 emails sent, resulting in replies from 3 political parties.

¹⁴ <https://privacyapp.mensenrechten.be>



Privacy cafés at the European Parliament

We organised two “Privacy Cafés” at the European Parliament. The purpose of Privacy Cafés was to teach the participants basic IT security and privacy protection skills and to raise awareness of online privacy and tracking, especially in a political context.

These events positioned EDRi as a key knowledge hub for tech and digital rights expertise and emphasised the need to protect users through strong digital rights EU legislation.

Challenge surveillance and data retention

In 2019, we continued to advocate against the use of personal data without adequate safeguards. With Commissioners reconsidering plans for retaining data and opening up personal – or even private – data and communications in ways that could jeopardise digital rights protections, EDRi has ensured that the rights enshrined in the EU’s data protection and fundamental rights law remain a top priority.

This commitment to a strong ePrivacy Regulation included proposing amendments and red lines on the draft text, holding meetings with influential Permanent Representations, and collaborating with prominent NGOs on an open letter calling for stronger privacy protections. The European institutions ultimately failed to reach an acceptable agreement in 2019, but the groundwork laid throughout 2019 also makes us hopeful about the adoption of a strong ePrivacy legislation in 2020.

The office held a series of meetings on terror and privacy laws with digital attachés from the Member States and the European Commission. In addition, the office participated in round-table discussions on EU counter-terrorism law organised by the International Commission of Jurists (ICJ), and had our material presented at the Council of Europe (CoE) Octopus Conference on cybercrime.

Member Highlights

Advocacy wins

epicenter.works campaigned against the ‘security package’ legislation introduced by the former Austrian government. The focus was against the state trojan horse and the collection and retention of registration plate data. In December, the Austrian Constitutional Court overturned the legislative package.

Elektronisk Forpost Norge argued against proposed legislation to extend the Norwegian military intelligence services’ ability to perform bulk data collection. This led to the proposal’s main sponsor (the leading conservative party “Høyre”) withdrawing their support. The proposal therefore never came to a vote in Norway’s parliament, and is currently being rewritten.

Privacy International won a Supreme Court case in the UK ensuring that the Investigatory Powers Tribunal overseeing intelligence services is now subject to judicial review.¹⁵

¹⁵ <https://privacyinternational.org/legal-action/queen-application-privacy-international-v-investigatory-powers-tribunal-uk-general>

Protect against unlawful and discriminatory profiling practices

Profiling practices rely on the massive collection and processing of personal data, which represent a great risk to the rights of privacy and data protection.

This processing is considered legitimate when done for public security purposes. But the lack of transparency and accountability behind many databases and profiling practices by law enforcement is problematic.

The use of sensitive protected characteristics and indicators also have the potential to be discriminatory. In addition, the multiplication and interoperability of EU migration databases can lead to severe violations of the fundamental rights of refugees and migrants.

In 2019, EDRI was part of an expert advisory group for the [Data, Discrimination and Effectiveness in Policing Report](#)¹⁶ by Patrick Williams and Eric Kind (commissioned by the Open Society Foundations and the European Network Against Racism).

Member Highlights

Migrant rights are human rights

Statewatch together with PICUM (Platform for International Cooperation on Undocumented Migrants) published the report '[Data Protection, Immigration Enforcement and Fundamental Rights: What the EU's Regulations on Interoperability Mean for People with Irregular Status](#)¹⁷' criticising the inherent risks of the various interoperable EU databases for the rights of undocumented migrants.

A future we want?

[Liga voor Mensenrechten](#) organised a '[big security debate](#)¹⁸' with academics, experts, high level policy makers and police authorities to discuss predictive policing, which is being introduced in Belgium as part of the i-police project.

[Open Rights Group](#) launched [Futurebook](#),¹⁹ an example of what the world might look like if the UK ditches current standards of digital right protections in EU law, such as data protection, Net Neutrality and content liability protections.

¹⁶ <https://www.enar-eu.org/IMG/pdf/data-driven-profiling-web-final.pdf>

¹⁷ <https://www.statewatch.org/media/documents/analyses/Data-Protection-Immigration-Enforcement-and-Fundamental-Rights-Full-Report-EN.pdf>

¹⁸ <https://stem.mensenrechten.be/veiligheidsdebat>

¹⁹ <https://www.futurebook.co>

Profiling practices rely on the massive collection and processing of personal data, which represent a great risk to the rights of privacy and data protection.

3.3 Information democracy

EDRI advances better governance of online platforms to guarantee a healthy democracy.

Freedom of expression and content moderation

States and companies increasingly try to control, restrict or monitor expression online. Consequently, the protection of this freedom is central to much of EDRI's work. In 2019, the regulation of internet content took center stage in EU politics.

The European Commission is preparing a revision of the current E-Commerce Directive to solve problems around the regulation of digital services and platform domination named the **Digital Services Act (DSA)**.

This would have a huge impact on fundamental rights and freedoms. EDRI has been central to such reform, bringing together members as well as non-digital rights NGOs such as those working on hate speech. A series of blogs²⁰ were published on the topic.

We spoke to the European Parliament on the Digital Services Act and met European Commission officials preparing the file, about the need to implement strong user protections in the DSA and prevent the forced outsourcing of law enforcement powers to platform operators.

Our campaign against upload filters in the Copyright Directive vote in the Parliament led hundreds of thousands to march on the street, 5 million petition signatories, as well as a near unanimous consensus of academia, internet luminaries and UN Special Rapporteurs.²¹ Since these tools cannot understand the **context of the uploaded content**, upload filters can become a **copyright tool**.



-

In March, at the peak of the Copyright Directive campaign, Slate reported that "Online Protests Sweep European internet Ahead of Copyright Law Vote".

Full article [here](#).²²

²⁰ <https://edri.org/our-work/e-commerce-review-1-pandoras-box/>

²¹ <https://twitter.com/edri/status/1007920647153049600>

²² <https://slate.com/technology/2019/03/wikipedia-blackout-eu-copyright-pornhub-reddit.html>

EDRi led campaigning and advocacy efforts, together with some of its members and the C4C Coalition, against upload filters ahead of the European Parliament plenary on the Copyright Directive.



-

Our German member @digitalcourage calls on minister @JuliaKlieckner to vote against the #CopyrightDirective and prevent #UploadFilters. On 15 April she will represent Germany during the vote in @EUCouncil. Sign the call: digital.courage.de/blog/2019/appe... #SaveYourInternet #Artikel13

From @EDRi

Full tweet and article [here](#).²³

Advocacy and Campaign on the reform of the Copyright regime at EU level

EDRi led campaigning and advocacy efforts, together with some of its members and the C4C Coalition, against upload filters ahead of the European Parliament plenary on the Copyright Directive.

We launched a funding program that supported 17 activists from across Europe to meet their elected representatives in Brussels and Strasbourg and that resulted in personal meetings with 48 MEPs and their offices. We also conducted email and phone conversations with MEP offices, covering almost all

Member Highlights

Digitale Gesellschaft organised a 30 000 people strong demonstration in Berlin against upload filters and the Copyright Directive.

epicenter.works initiated one of the most important campaigns in the fight against upload filters called pledge2019.eu, enabling citizens from all over Europe to call their MEPs free of charge to convince them to vote against Article 13. More than 3,500 calls were made through epicenter.works' website. All in all, interested citizens had more than a week of pure talking time with MEPs.

²³ <https://twitter.com/edri/status/1113822048332201984>

“Our campaign against
in the Copyright Directive
Parliament led hundreds
to march on the streets
signatories, as well as
- consensus of academic
luminaries and UN Sp

st upload filters
ctive vote in the
eds of thousands
et, 5 million **petition**
s a near unanimous
emia, internet
pecial Rapporteurs.”

political groups from 17 Member States.

This effort, along with the online petition and mass demonstrations in Germany and elsewhere, demonstrated our great mobilisation capacity. The end vote was lost by a margin of 5 votes (considering that 13 MEPs later reported that they accidentally voted against it).

EDRi spoke with cultural associations and human rights groups such as Wikimedia, Liberties and Communia about next steps during the implementation phase. EDRi also participated in the stakeholder meetings organised by the European Commission to discuss the implementation of Art.17 (the upload filters proposal, former Art.13).



-

After the decisive vote, The Verge published that “Ten European lawmakers say they voted against pivotal copyright amendment by accident”

Full article [here](#).²⁴



-

The Verge described the legislative process of the Terrorist Content Regulation as “Aggressive new terrorist content regulation passes EU vote” by quoting our statement to give the full picture.

From @verge
Full tweet and article [here](#).²⁵

Member Highlights

Wikimedia, together with Communia and Europeana, managed to include one of the few unambiguously positive provisions in the **Copyright in the Digital Single Market Directive : the Public Domain Safeguard**.

The provision makes sure that once works with expired copyrights are digitised, their digital copies also remain copyright free. This had not been the case²⁶ in all legislation across the EU.

Modern Poland Foundation organised the 8th edition of the **CopyCamp** conference about the social and economic impact of copyright.

In 2019, they organised workshops for creators and designers about negotiating contracts with publishers and producers.

They also co-authored a textbook on copyright and industrial property for high schools together with lesson scenarios and test templates, co-organised workshops for high school teachers and conducted classes with students at two high schools in Poland.

As a result of our work we succeeded in influencing the European Parliament Report to avoid the worst threats to freedom of expression. We will continue to work on the legislative process to ensure that these changes remain in the final text.

The European Union Terrorist Content Online Regulation

The original proposal presented serious risks for fundamental rights online, specifically on privacy and freedom of expression. The proposal to impose upload filters to detect "terrorist content" and the incentives for companies to regulate speech online without redress mechanisms was criticised by UN Special Rapporteurs, the Council of Europe and the Fundamental Rights Agency. In 2019, we co-organised, along with EDRI member **Access Now** and **Center for Democracy and Technology** (CDT), an event at the European Parliament featuring **Fionnuala Ní Aoláin**, the UN Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism.

As a result of our work we succeeded in influencing the European Parliament Report to avoid the worst threats to freedom of expression. We will continue to work on the legislative process to ensure that these changes remain in the final text.

²⁴ <https://www.theverge.com/2019/3/27/18283837/europe-copyright-directive-accidental-vote-meps-amendment>

²⁵ <https://www.theverge.com/2019/4/17/18412278/eu-terrorist-content-law-parliament-takedown>

²⁶ <https://pro.europeana.eu/post/keeping-digitised-works-in-the-public-domain-how-the-copyright-directive-makes-it-a-reality>

▾ Promotion of alternatives to dominant online services, hardware and software



Chaos Communication Camp

The Chaos Communication Camp 2019, a 5 000 attendee hacker retreat, took place in August near Berlin. Here EDRI planned, coordinated and animated the About:Freedom village.

The village integrated and gathered more than 15 organisations, both from the EDRI network and external allies (such as Tor Project, Open Observatory on Network Interference, Extinction Rebellion and other sustainability-focused groups). It was the second largest village both in terms of the number of people who registered and the number of talks.

About:Freedom hosted 3 stages with more than 60 talks overall, with a high level of attendance and diverse audience participation for all sessions.

Aside from the more serious aspects, the village offered a comfortable set up and positive environment, fostering an open policy arena connecting diverse organisations.

About:Freedom hosted 3 stages with more than 60 talks overall, with a high level of attendance and diverse audience participation of all sessions.

▾ Reforming the online tracking advertising industry (AdTech)

Online advertising allows for a free internet: users navigate the web for free, while publishers, websites and app developers monetise their products and content through advertisements. But today, the industry has become excessively invasive.

Users are being tracked while their personal data and behaviours are being recorded, shared and used to build an elaborate consumer profile. This profile is then used to personalise and target advertising, in contravention of privacy and data protection legislation. Profiles can also end up being tools for discrimination, disinformation and manipulation.

²⁷ <https://privacyinternational.org/taxonomy/term/552>

²⁸ <https://en.panoptikon.org/online-advertising-is-broken>

Member Highlights

— Challenging AdTech

Open Rights Group challenged AdTech's uncontrolled sharing of personal data, through a complaint to the UK Information Commissioner, **triggering an investigation** into the industry that concluded that it is **operating unlawfully** – but as yet, without meaningful enforcement to stop their practices.

Privacy International published a [report on app data sharing](#),²⁷ after which **two thirds of all the apps mentioned** were retested. Spotify, Skyscanner and KAYAK, have since updated their apps so that they no longer contact Facebook when you open the app.

Panoptikon published [10 Reasons Why Online Advertising is Broken](#),²⁸ explaining how the business model imposed by internet platforms undermines quality journalism and critical judgment, while **fueling click-bait material and disinformation**.

▾ Tackling disinformation and interference in electoral campaigns

The dangerous impact of disinformation on our democratic societies is the consequence of the constant tracking, monitoring and assessment of people's online behaviour.

Today's political microtargeting practices are based on the massive collection and exploitation of personal data leading to the creation of "echo chambers", the manipulation of voters' intention and the amplification of polarising content.

To share this analysis of the root causes of disinformation, EDRI contributed to the Virtual Insanity project led by the European Partnership for Democracy that aims at building a civil society consensus on digital political advertising transparency.

▾ Promoting digital rights in trade agreements

As members of the Commission's Expert Group on EU Trade Agreements, EDRI participated in bilateral and group meetings with DG TRADE officials, discussing the protection of fundamental rights in new Free Trade Agreements as well as the EU's position on the upcoming World Trade Organisation negotiations on e-commerce.

EDRI staff also attended the annual Transatlantic Consumer Dialogue³⁰ meeting in Washington D.C.

Member Highlights

—
Xnet published a book on fake news and disinformation called #FAKE YOU - Fake News and Disinformation²⁹ about the monopoly of information manipulation and reduction in freedom of expression.

— Unveiling German spyware used by Turkish government

The Chaos Computer Club³¹ examined 28 different Android software applications to determine if spyware was used. According to EDRI member **GFF** (Gesellschaft Für Freiheitsrechte), a spyware sample had been used in Turkey in 2017 against political opponents. Further investigation proved that this sample originated from the "FinSpy" malware family.

As a consequence GFF together with a network of human and digital rights NGOs, filed a criminal complaint against the managing directors of 3 German spyware manufacturing companies in July 2019.

The companies had presumably sold spyware to Turkey without export licenses, thus assisting in the surveillance of opposition members and journalists.

These individuals, as well as the responsible German authorities, must come under scrutiny to ensure that German companies do not aid repressive regimes that surveil their population.

²⁹ <https://xnet-x.net/informe-fake-news-desinformacion/>

³⁰ <https://tacd.org/tacd-annual-forum-2019-consumerprotection-in-the-digital-sphere/>

³¹ <https://www.ccc.de/en/club>

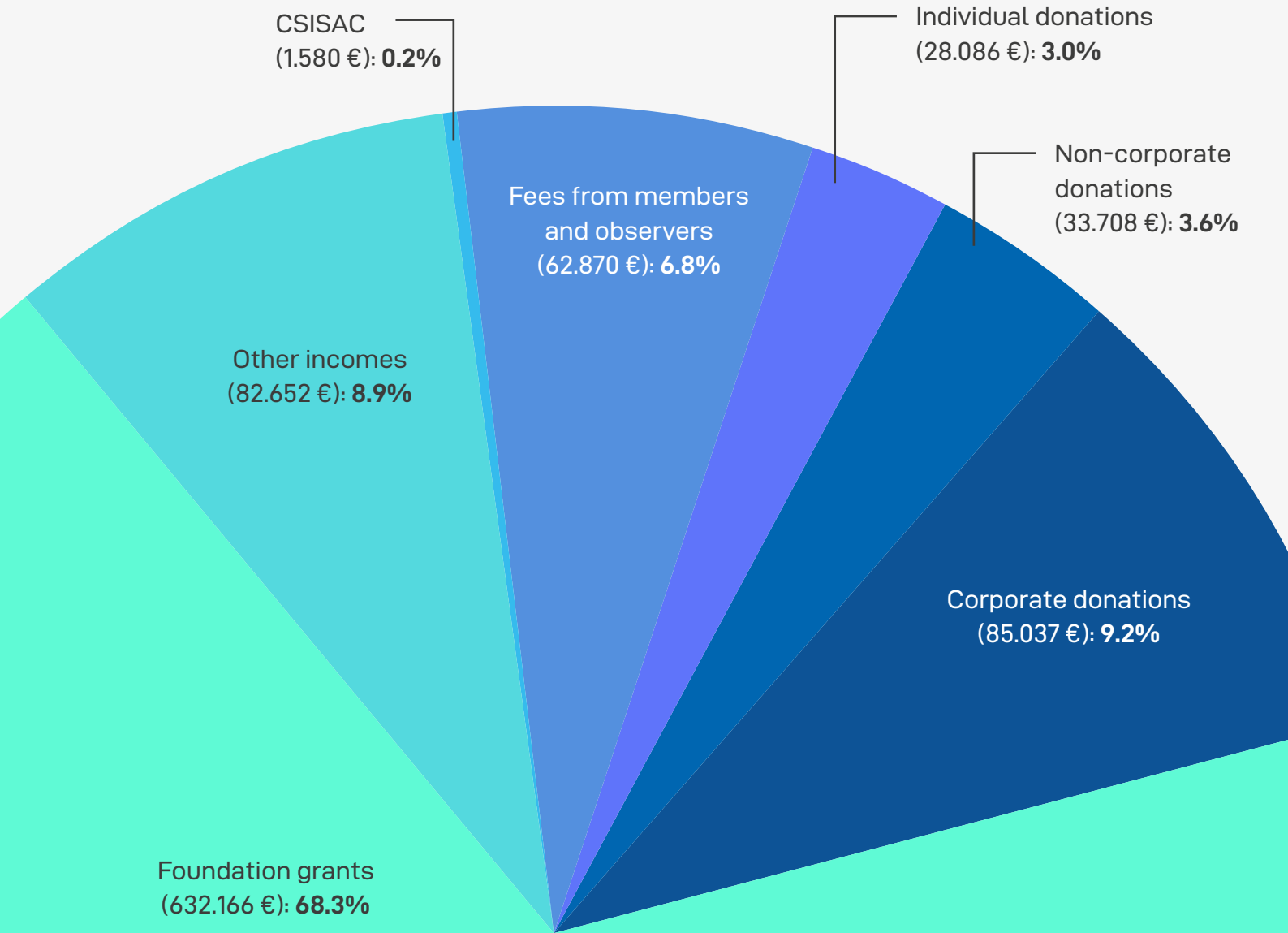


04

Our finances

Despite the general lack of funding for civil society organisations working in the area of human and civic rights in the European Union, EDRi witnessed a notable increase of income in 2019.

4.1 Income



Our income increased mainly thanks to obtaining support from two new foundation donors – Luminare (part of the Omidyar Group) and Civitates – a collaborative philanthropic initiative for democracy and solidarity in Europe. Foundation grants remained the dominant source of funding for EDRI in 2019, but we are continuing our efforts towards diversifying our funding sources in the future.

As per EDRI's [fundraising policy](https://edri.org/wp-content/uploads/2020/09/Fundraising-Policy.pdf)³², we welcome individual and corporate funds that support the development and fulfillment of our mission. Secure and diverse funding enables EDRI to maintain its independence, remain credible and operate effectively. New grants and project funding should be compatible with our [2020-2024 strategy](https://edri.org/wp-content/uploads/2020/05/EDRI_Strategy_Summary.pdf).³³

³² <https://edri.org/wp-content/uploads/2020/09/Fundraising-Policy.pdf>

³³ https://edri.org/wp-content/uploads/2020/05/EDRI_Strategy_Summary.pdf

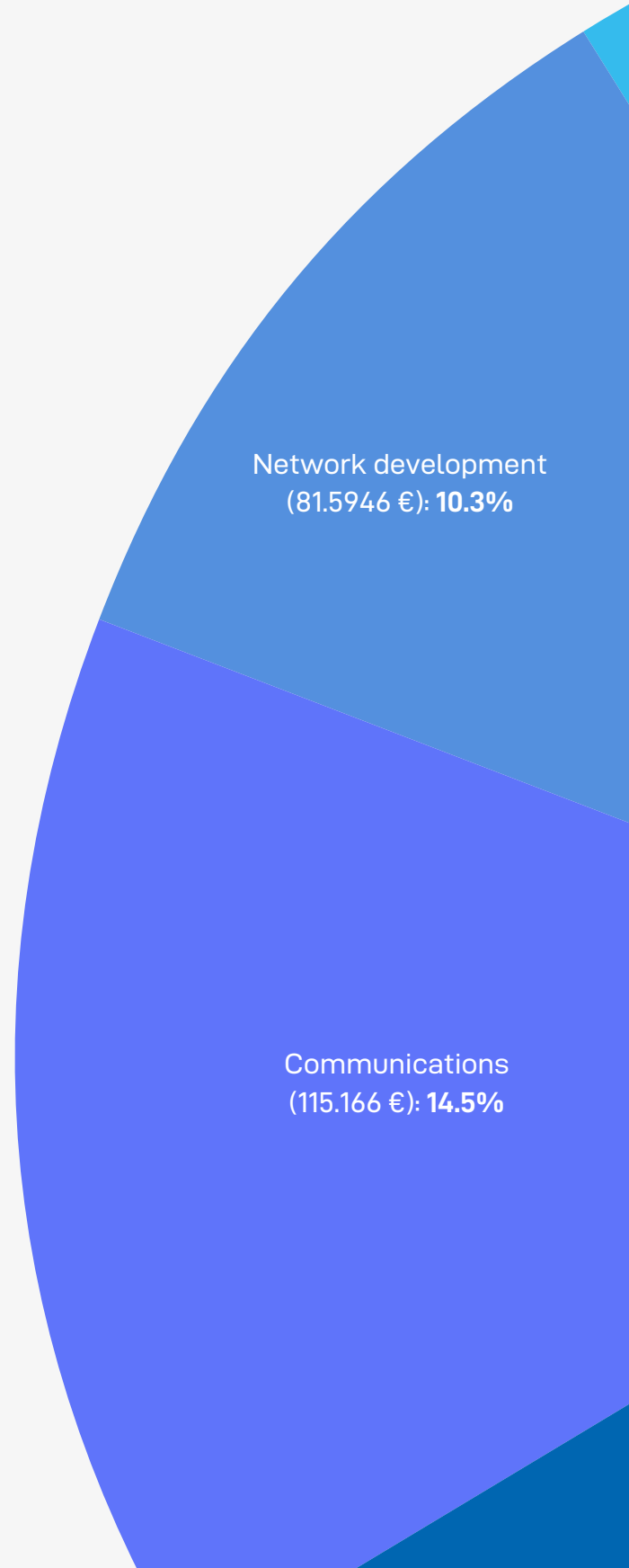
Fees from members and observers	62.870 €	6.80%
Individual donations	28.086 €	3.00%
Non-corporate donations	33.708 €	3.60%
European Data Protection Supervisor (EDPS)	13.573 €	
Wikimedia Germany	5.900 €	
Electronic Privacy Information Center (EPIC)	5.000 €	
The Swedish Internet Foundation	5.000 €	
Council of European National Top-Level Domain Registries (CENTR)	2.500 €	
Security Bsides Barcelona	1.000 €	
Electronic Frontier Finland	685 €	
ALCEI	50 €	
Corporate donations	85.037 €	9.20%
Mozilla	30.000 €	
DuckDuckGo	22.543 €	
Twitter	15.000 €	
Microsoft	15.000 €	
Mailfence	911 €	
AirVPN	500 €	
Sum of other donations under 500 €	1.083 €	
Foundation grants	632.166 €	68.30%
Open Society Foundations	168.440 €	
Adessium Foundation	147.549 €	
Luminate / The Omidyar Group	121.203 €	
Ford Foundation	114.936 €	
Civitates	46.788 €	
Democracy & Media Foundation	30.000 €	
European Cultural Foundation	3.250 €	
Other incomes	82.652 €	8.90%
Other donations (in-kind, contributions)	12.419 €	
Other incomes (sub-renting of the office and related costs)	70.233 €	
Civil Society Information Society Advisory Council (CSISAC)	1.580 €	0.20%
TOTAL	926.099 €	100.00%

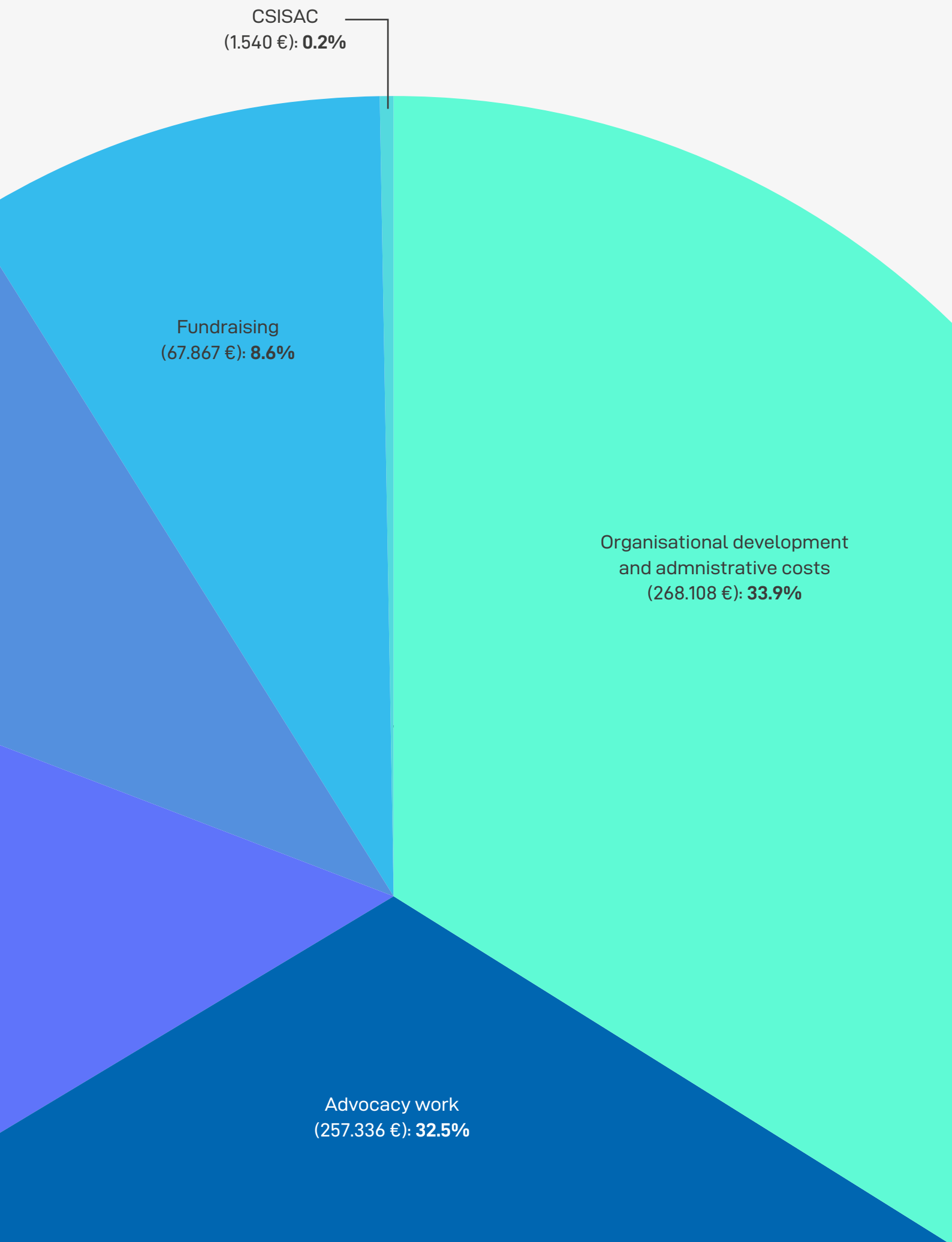
4.2 Expenditure

In 2019, we were able to spend more to support our collective work (from 666,000 € in 2018 to 791,000 in 2019). The EDRI office was able to strengthen its policy team in Brussels by recruiting two new policy advisors to be able to cover the ever-expanding range of relevant policy issues and proposals, and to support civil society activities related to the protection of human rights and freedoms in the online environment on a pan-European level. Our policy team currently consists of 5 full-time policy advisors.

We were also able to organise a capacity-building workshop for 14 member organisations from across Europe on how to effectively fundraise.

Finally our budget allowed us to organise our annual Privacy Camp 2019 conference, which brought together over 230 digital rights advocates, activists as well as academics and policy-makers from all around Europe (and beyond) to discuss the most pressing issues facing human rights online.





Mass surveillance. Random Censorship. Content Restrictions.

Companies and governments
increasingly restrict our freedoms.

—
DONATE NOW:

<https://edri.org/>

[take-action/donate](https://edri.org/take-action/donate)

EDRi is the biggest European network
defending rights and freedoms online.

**Privacy! Free Speech!
Access to Knowledge
and Culture!**

▾ **Press enquiries**

press@edri.org

▾ **Brussels office**

brussels@edri.org

▾ **Phone number**

+32 2 274 25 70

▾ **Visit us**

Rue Belliard 12
1040 Brussels
Belgium

▾ **Follow us**

[Twitter](#)
[Facebook](#)
[LinkedIn](#)
[Youtube](#)



European Digital Rights (EDRI) is the biggest European network defending rights and freedoms online. We promote, protect and uphold human rights and the rule of law in the digital environment, including the right to privacy, data protection, freedom of expression and information.

www.edri.org