

Code of Practice on
Disinformation – Report of
Who Targets Me for the
period 2024

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Executive summary

Who Targets Me works to understand and report on the uses of online political advertising. We advocate for transparent, responsible use of political advertising, working to engage with parties and candidates, platforms, governments and regulators on the subject. We also conduct primary research and build tools to help individuals and fellow researchers understand the prevalence, nature and impact of online political advertising.

In this reporting period, we have:

- Maintained and updated the Who Targets Me browser extension to make it quicker and easier to track political advertising anywhere in the world.
- Added new platforms to the tool (Instagram, YouTube and Twitter/X).
- Launched “Trends”, a service to automatically track political advertising spending, targeting and messaging across all EU member states.
- Modified and improved our proposed standard for political advertising transparency.
- Continued our work on DiCED, a Horizon 2020 funded project with the University of Manchester, a comparative study of targeted political advertising campaigns around the world.
- Worked with civil society partners, academics, researchers and journalists to monitor the use of political ads in the 2024 EU elections.
- Continued to support efforts to ensure that the TTPA is effective when it enters full force later in 2025.

II. Scrutiny of Ad Placements	
Commitment 2	
Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising messages.	
Measure 2.2	
QRE 2.2.1	Who Targets Me continued to develop the Who Targets Me browser extension to allow users to view additional context about the political adverts that they are being targeted with on Facebook, Instagram, Twitter/X and YouTube, including the political parties affiliated with the political ads they see. The information collected by users of the extension is also anonymised and aggregated into a wider data library, accessible to vetted researchers, to enable them to identify trends in advertising behaviours, including instances of misinformation and political manipulation. We also carry out interpretation work on data from platform ad libraries (Google, Facebook, Snapchat) as well as on the advertising policies of platforms that permit political advertising.

II. Scrutiny of Ad Placements	
Commitment 3	
Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services. [change wording if adapted]	
Measure 3.1	[insert wording if adapted]
QRE 3.3.1	No actions to report in 2024.

III. Political Advertising	
Commitment 4	
Relevant Signatories commit to adopt a common definition of “political and issue advertising”.	
Measure 4.1	
Measure 4.2	

QRE 4.1.1 (for measures 4.1 and 4.2)	Who Targets Me continues to engage with the implementation process for the TTPA. We are focused on ensuring that high standards of transparency are consistently applied across platforms and services, and have made a number of explicit technical recommendations which we believe would achieve this.
QRE 4.1.2 (for measures 4.1 and 4.2)	

III. Political Advertising	
Commitment 6	
Relevant Signatories commit to make political or issue ads clearly labelled and distinguishable as paid-for content in a way that allows users to understand that the content displayed contains political or issue advertising.	
Measure 6.1	
QRE 6.1.1	Who Targets Me has worked with the University of Sheffield on experiments to study the design of paid for disclosures in the UK, as well as the labelling and user understanding of political advertisements with the University of Hohenheim (paper forthcoming). In H1 2025, we will work on a similar experiment with the University of Manchester.
Measure 6.3	
QRE 6.3.1	See QRE 6.1.1

III. Political Advertising	
Commitment 8	
Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.	
Measure 8.1	
Measure 8.2	Not applicable to Who Targets Me.
QRE 8.2.1 (for measures 8.1 & 8.2) [insert wording if adapted]	<p>Who Targets Me continues to develop and evolve a proposed common, universal transparency standard for political advertising that clearly defines the transparency obligations of advertising platforms.</p> <p>We have outlined a proposed technical standard for ad transparency on Github, and have specified what types of data we think must be included (https://github.com/WhoTargetsMe/ad-transparency-standards).</p> <p>Who Targets Me is working with relevant signatories and policy makers to explore common minimum transparency obligations and standards.</p>

III. Political Advertising

Commitment 9

Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.

Measure 9.1	
Measure 9.2	
QRE 9.2.1 (for measures 9.1 & 9.2) [insert wording if adapted]	<p>Though we are not an advertising service, Who Targets Me aims to provide individual users with additional context around the political adverts that are targeted at them, presented in a clear and easy to understand way.</p> <p>On our website, users of our browser extension can access a dashboard to easily view information about the political advertisements that are shown to them on Facebook (with Instagram, YouTube and Twitter/X to follow by the end of 2025), including specific targeting data relating to each advert.</p> <p>Users have the option to download the specific advert data as a CSV, containing more information about the specific target demographic of each advert (such as age group, country, gender and constituency).</p> <p>By drawing from our library of aggregate advertising data donated by users of our extension, and by cross-referencing political adverts against a researched list of political advertisers, Who Targets Me also provides users with additional context around their political ad interactions beyond what is available to them on Facebook. This includes data on which national and European political parties are targeting a user and how political parties are targeting a user’s electoral area, as well as the frequency of political ads that a user sees compared with the average Who Targets Me user.</p> <p>We also provide https://trends.whotargets.me, which tracks spending, targeting and messaging (via LLM summaries) for over 100,000 online political advertisers in the EU and beyond.</p>

III. Political Advertising

Commitment 10

Relevant Signatories commit to maintain repositories of political or issue advertising and ensure their currentness, completeness, usability and quality, such that they contain all political and issue advertising served, along with the necessary information to comply with their legal obligations and with transparency commitments under this Code.

Measure 10.1	
Measure 10.2	

QRE 10.2.1 (for measures 10.1 & 10.2)	Our repository, trends.whotargets.me aggregates data from the Meta and Google Ad Libraries, to provide additional context and information about patterns of political advertising spending, content and targeting across more than a hundred European political parties. The site is automatically updated daily, and is widely used by journalists and researchers covering political advertising. Our goal in 2025 is to add further features, to create a compliment to the platform ad libraries and offer additional transparency and improved usability.
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III. Political Advertising	
Commitment 11	
Relevant Signatories commit to provide application programming interfaces (APIs) or other interfaces enabling users and researchers to perform customised searches within their ad repositories of political or issue advertising and to include a set of minimum functionalities as well as a set of minimum search criteria for the application of APIs or other interfaces.”	
Measure 11.1	
Measure 11.2	
Measure 11.3	
Measure 11.4	
QRE 11.1.1 (for measures 11.1-11.4)	We will launch APIs for our Trends service in 2025.

III. Political Advertising	
Commitment 12	
Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices.	
Measure 12.1	
Measure 12.2	
Measure 12.3	
QRE 12.1.1 (for measures 12.1-12.3)	<p>Through our browser extension and data visualisation tools, Who Targets Me enables users and vetted researchers to more effectively scrutinise advertising practices on social media.</p> <p>The Who Targets Me browser extension allows users to examine political ads that are being targeted to them on Facebook, YouTube, Instagram and Twitter/X, providing them with a dashboard where they can view information about the ads they see, including the political party affiliations of said ads. The data collected is available to vetted researchers on request.</p>

	<p>In addition, we also provide dashboards tracking political ad spending, targeting and messaging on Meta and Google for every EU country, broken down by political party or group. At this time, all member states have actively maintained dashboards, which were used to track activity during the EU elections, as well as the many national elections in 2024. This data is available at trends.whotargets.me</p> <p>In 2024, we worked with journalists and researchers to cover the use of political ads across the continent, contributing to a number of reports, articles and papers.</p>
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III. Political Advertising	
Commitment 13	
Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.	
Measure 13.1	
Measure 13.2	
Measure 13.3	
QRE 13.1.1 (for measures 13.1-13.3)	There was no engagement with other signatories on this Commitment in 2024. This, along with Google's announcement it would leave the EU political advertising market in 2025, was a disappointment, as it makes monitoring advertising in the political space more difficult.

V. Empowering Users				
Commitment 17				
In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups.				
Measure 17.1				
QRE 17.1.1 [insert wording if adapted]	Who Targets Me's browser extension continues to be available in all EU countries and in many languages. The tool is designed to provide additional context about political advertising to its users. In 2024, we added support for Instagram, Twitter and YouTube advertising.			
SLI 17.1.1 - actions enforcing policies above [change wording if adapted]	Methodology of data measurement			
	Total count of the tool's impressions	Interactions/ engagement with the tool	Other relevant metrics	Other relevant metrics
Data	Over 100,000 installs	Over 10,000 active users in 2024	Primary EU countries are Germany, Hungary and Poland.	

Measure 17.2					
QRE 17.2.1 [insert wording if adapted]	We regularly communicate about political advertising campaigns, trends and policy via our social media accounts and newsletter. We also regularly participate in conferences and talks about the topic.				
SLI 17.2.1 - actions enforcing policies above [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]				
	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of participants	Nr of interactions with online assets	Nr of participants (etc)
Data	N/A	N/A	N/A		
Measure 17.3					
QRE 17.3.1	See QRE 6.1.1				

VI. Empowering the research community

Commitment 26

Relevant Signatories commit to provide access, wherever safe and practicable, to continuous, real-time or near real-time, searchable stable access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation through automated means such as APIs or other open and accessible technical solutions allowing the analysis of said data.

Measure 26.1					
QRE 26.1.1 [insert wording if adapted]	Who Targets Me's data library is anonymised and does not include personally identifiable information such as name, email or Facebook profile information. We carefully vet individuals and organisations requesting access to our data for research purposes in order to limit the risk of misuse. To be granted access, researchers must first demonstrate that they have legitimate research interests and clear goals that access to such data will help them to achieve. They must also agree to submit to data protection and data deletion practices. Who Targets Me will never permit access to entities where there is deemed to be a risk of abuse.				
QRE 26.1.2 [insert wording if adapted]	<p>To access data points from Who Targets Me, users are required to contact Who Targets Me to request a login. After being vetted via the process outlined in QRE 26.1.1, successful applicants are provided with a training session explaining the datasets available and how to access and interpret the data (e.g. how to use search and filter functions).</p> <p>The types of data points available to vetted researchers include:</p> <ul style="list-style-type: none"> - Political ad impressions and information about the advertisers - Tagged advertiser data - Advertiser spending - Aggregated targeting information - Overall trends - topics, volume/frequency of political advertising. 				

	<p>Most data is non-representative, as it is provided by users who choose to install our software. Some academic partners recruit users of Who Targets Me with representative polling surveys.</p> <p>Who Targets Me is working to make any relevant information related to data points accessible via a relevant webpage, and in the Transparency Centre.</p>		
SLI 26.1.1 - e uptake of the tools and processes described in Measure 26.1 [change wording if adapted]	N/A (No public access)		
	Nr of users of public access	Other quantitative information on public access	Other quantitative information on public access
Data	N/A (No public access)		

VI. Empowering the research community	
Commitment 27	
<p>Relevant Signatories commit to provide vetted researchers with access to data necessary to undertake research on Disinformation by developing, funding, and cooperating with an independent, third-party body that can vet researchers and research proposals.</p>	
Measure 27.1	
QRE 27.1.1	Who Targets Me is prepared to meet the commitments for vetting researchers in the future, as and when they are agreed.
Measure 27.2	
QRE 27.2.1	Who Targets Me will share information when relevant.
Measure 27.3	
QRE 27.3.1	N/A
SLI 27.3.1 - research projects vetted by the independent third-party body	
	None.
Data	
Measure 27.4	
QRE 27.4.1	We are not participating in any pilot programmes, but would do so if invited.

VI. Empowering the research community	
Commitment 28	
<p>Relevant Signatories commit to support good faith research into Disinformation that involves their services.</p>	

Measure 28.1	
QRE 28.1.1	Researchers can contact us directly to discuss their projects and ideas. Our small team responds to all enquiries.
Measure 28.2	
QRE 28.2.1	Data is available by contacting our team. It can be accessed in bulk or via API.
Measure 28.3	
QRE 28.3.1	No relevant activity in 2024.

X. Monitoring of Code	
Commitment 38	
The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code.	
Measure 38.1	
QRE 38.1.1	Who Targets Me worked to contribute to the Code in accordance with our small size and areas of interest (primarily political advertising transparency, user empowerment and researcher access to data).