

Code of Practice on
Disinformation – Report of
Who Targets Me for the
period 16 December 2022 to
16 January 2023

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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:

1/ For the Code:

- Participated in two sub-groups of the Taskforce
- Worked to understand the reporting process and deliver this first report.

2/ Updated our tools:

- Maintained and updated the Who Targets Me browser extension to make it quicker and easier to track political advertising anywhere in the world
- Developed our “Manage” tools, which allow vetted researchers (including ourselves) to access advertising impressions data, classify political advertisers and more.
- Prepared localisations and datasets for national elections in the EU in 2023
- Modified and improved our proposed standard for political advertising transparency

3/ Worked with researchers:

- DiCED, a Horizon 2020 funded project with the University of Manchester, a comparative study of targeted political advertising campaigns around the world.
- Planned forthcoming work with the Max Planck Institute for Human Development in Berlin on feed ranking and transparency.
- Published a report on the use of political advertising in the 2022 Hungarian election in collaboration with other civil society organisations.

4/ Developed policy solutions

- Worked with fellow NGOs on discussions around the forthcoming EU Political Advertising Regulation definition of political advertising to develop a balanced definition of political advertising.

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	<p>Who Targets Me developed 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, including the political parties affiliated with the political ads they see.</p> <p>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.</p> <p>Who Targets Me is also considering the potential of partnerships to enhance the ability of its tools to reduce the reach of misinformation. We are exploring the application of Full Fact's automated fact-checking API to the text of the ads that our users see, to help them determine whether an advert contains false or misleading information. We hope to make progress on this in H1 2023, with a view to making it more broadly available by the end of 2023 (language restrictions apply).</p>

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.	
Measure 3.3	
QRE 3.3.1	<p>In the past, Who Targets Me has piloted collaborations with several fact-checking organisations to explore ways to help users better identify misinformation online, including collaborations with Correctiv (Germany) and Lakmusz (Hungary) and Full Fact (UK).</p> <p>We are currently exploring the application of Full Fact's automated fact-checking API to the text of the ads that our users see to help them determine whether an advert contains false or misleading information. We hope to make progress on this in H1 2023, with a view to it being more broadly available by the end of the year (language restrictions apply).</p>

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 is engaged in policy development efforts with a range of civil society collaborators, particularly around the forthcoming regulation on political advertising. Our goal is to ensure that any definition of political advertising is appropriate (not so broad as to capture non-paid speech), while flexible enough to include new developments (e.g. the role of paid influencers). Who Targets Me continues to publish relevant policy ideas relating to the identification of political ads on its blog (e.g. https://whotargets.me/en/how-to-correctly-identify-political-ads/).
QRE 4.1.2 (for measures 4.1 and 4.2)	After the first year of the Code’s operation, Who Targets Me will share its position on whether or not further work with the Task-force is necessary.

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 is working on a transparency labelling project in 2023, in collaboration with the University of Manchester, to develop best practices for labelling political adverts. This will involve design research on the content and design of labels, to make them clear and informative to users. We will publicise the findings of this research, including recommendations for best practices around labelling, when it becomes available. Who Targets Me is also partnering with the Max Planck Institute on Human Development in Berlin to carry out research around feed design, ranking and content labelling, and will publicise relevant insights on content labelling for political adverts when this research is complete (H2 2023)
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. [change wording if adapted]

Measure 8.1

Measure 8.2

[N/A to Who Targets Me]

QRE 8.2.1 (for measures 8.1 & 8.2)

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.

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>).

Who Targets Me is working with relevant signatories and policy makers to explore common minimum transparency obligations and standards.

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)

Whilst 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.

On our website, registered users can access a dashboard to easily view information about the political advertisements that are shown to them on Facebook, including specific targeting data relating to each advert.

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).

	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.
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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, providing them with a central dashboard where they can view information about the ads they see, including the political party affiliations of said ads. We are working hard to ensure the continued reliable operation of our browser tool.</p> <p>The information collected by users of the extension is also aggregated into a wider data library, accessible to vetted researchers via secure login via our 'Manage' tool (https://manage.whotargets.me).</p> <p>This enables researchers to more easily identify trends in advertising behaviours, including instances of misinformation and political manipulation.</p> <p>We also do interpretation work on data from platform ad libraries (Google, Facebook, Snapchat) as well on the advertising policies of platforms that permit political advertising. For instance, we developed the US 2022 Midterms Targeting Dashboard to help users closely track political advertising behaviours during the elections across a range of targeting options, including location, interests, age, gender and language (https://whotargetsme.shinyapps.io/midterms2022/). We are working to provide similar visualisation tools for multiple European elections in 2023.</p> <p>We will continue to closely follow the status of political advertising on major platforms and notify fellow signatories should we encounter any issues with the implementation of advertising policies or this code.</p>

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)	While the Task-force is yet to convene for this discussion, Who Targets Me will be pressing for the first of these meetings to take place in H1 2023. In these meetings, we commit to evaluating whether sufficient scrutiny of political and issue advertising is taking place across Member States, including discussion over the potential for implementing advertising blackout periods around key elections.

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	<p>The Who Targets Me has developed a browser extension which aims to increase media literacy and awareness around targeted political advertising, by helping users to better understand how and why they are being targeted with political ads. Through the results dashboard, the browser extension allows users to view additional context about the political adverts targeted to them on Facebook, including the political party affiliations of advertisers, as well as wider trends in advertiser behaviours.</p> <p>While Who Targets Me's browser extension is available to access across all Member States, it has not yet been translated into every EU language and not every country has political advertisers identified in our tools. We aim to work with local civil society, researchers and journalists to classify political advertisers across the EU before the elections in 2024.</p> <p>In addition to this, Who Targets Me also provides data analysis and visualisation tools to enhance users' understanding of political advertising behaviours. For instance, we developed a US 2022 Midterms Targeting Dashboard to help users better visualise political advertising spend and targeting techniques on Facebook during the election period across a range of targeting options, including location, interests, age, gender and language.</p> <p>We are working to provide similar visualisation tools for Member States for multiple European elections in 2023.</p>

SLI 17.1.1 - actions enforcing policies above	Installed users					Interactions/ engagement with the tool	Primary EU user base is in Germany (61%), Hungary (17%), Poland (7%) and Austria (6%).	Other relevant metrics		
	Data	78481 installed users of Who Targets Me				7478 active users (last 90 days)				
Measure 17.2										
QRE 17.2.1	<p>Who Targets Me takes multiple approaches to improving media literacy and awareness around targeted online political advertising. Together, these approaches seek to demystify the challenges of current political advertising practices and outline potential solutions for creating a safer political advertising environment online.</p> <p>1/ We use social media platforms such as Facebook, Twitter and Mastodon to communicate with the public about online political advertising. Content published on Twitter and Facebook includes insights into online advertising behaviours during key European and global elections, new developments around the regulation of political advertising and clear explanations of how our data visualisation tools work.</p> <p>In addition, we are launching a new regular newsletter to provide further information around political ads and digital campaigns (https://whotargetsme.substack.com). This builds upon our existing blog content, which provides insights into election-related advertising behaviours and policy ideas, as well as commentary on threats to advertising safety, such as troll farms and AI chatbots (https://whotargets.me/en/blog/).</p> <p>We are also exploring the possibility of organising a conference in 2023 on political advertising, aimed at facilitating open discussion around safer political advertising practices.</p>									
SLI 17.2.1 - actions enforcing policies above	N/A					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	N/A		
Measure 17.3										
QRE 17.3.1	<p>With the goal of increasing awareness around targeted political advertising, Who Targets Me has partnered with the University of Manchester on a project to improve the labelling of political adverts. The project, which will involve the developing and testing of clearer and more informative political ad labels, aims to help users better understand the context in which they are seeing a political ad. Who Targets Me will share</p>									

	Who Targets Me may work with Full Fact to enhance our software users' ability to identify misinformation online. We are exploring the application of Full Fact's automated fact-checking API to the text of the ads that our users see, to help them determine whether an advert contains false or misleading information. We hope to make progress on this in H1 2023, with a view to it being more broadly available by the end of next year (language restrictions apply).
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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	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	<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 - 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	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)		

Measure 26.2						
QRE 26.2.1	Vetted partner users with logins can access real-time, machine-readable data for their projects, via the Who Targets Me Manage tool (https://manage.whotargets.me). APIs are also made available to researchers for access to up-to-date, aggregated Who Targets Me data, on political ad impressions, advertiser interests and targeting methods (link to documentation available here). Who Targets Me's data is anonymised and does not include personally identifiable information such as name, email or profile information.					
QRE 26.2.2	Manifestly made public data available on Who Targets Me includes impressions of political Facebook ads seen by users of the Who Targets Me browser extension, as well as some interpreted datasets, like the 'Decoder' project, which provides a breakdown of the political ads published by the Trump and Biden campaigns during the 2020 US presidential election (https://decoder.whotargets.me/).					
QRE 26.2.3	To access non-personal data via the "Manage" tool, researchers contact Who Targets Me with a proposal by email, outlining their motivation for wanting access. To be granted approval, researchers must first demonstrate that they have legitimate research interests and clear goals that such access will help them achieve. They must also agree to submit to data protection and data deletion practices and agreements.					
SLI 26.2.1 - meaningful metrics on the uptake, swiftness, and acceptance level of the tools and processes in Measure 26.2	We receive a handful of requests for data access each quarter, generally granting only one or two. Most are rejected due to them not meeting a threshold for interesting, valuable research (simplistic, lacking depth or repetitive of other research), or that the request is for data we do not hold.					
	No of monthly users	No of applications received	No of applications rejected	No of applications accepted	Average response time	Other metrics
Data	N/A	N/A	N/A	N/A	N/A	N/A

VI. Empowering the research community

Commitment 27

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.

Measure 27.1						
QRE 27.1.1	Whilst not directly involved in the development of an independent third-party body, Who Targets Me is closely tracking the process and is prepared to meet the commitments for vetting researchers in the future, as and when they are agreed.					
Measure 27.3						
QRE 27.3.1	Once an independent third-party body has been set up and is operational, Who Targets Me will share details about how it is cooperating with this body to facilitate the sharing of data for research purposes.					
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	
Relevant Signatories commit to support good faith research into Disinformation that involves their services.	
Measure 28.1	
QRE 28.1.1	Through our 'Manage' tool, we provide vetted researchers with access to useful data around political advertising behaviours. Researchers can use the search function to access relevant information on political ad post impressions as well as view the political affiliations of advertisers on Facebook. Such researchers can download this data for use in their research projects. We continue to maintain an open dialogue with researchers to collect feedback on ways to improve our tools for research use.
Measure 28.2	
QRE 28.2.1	Via the 'Manage' tool, European researchers can access data relating to the ads seen by Who Targets Me users, including post impressions, as well as classifications of political advertisers by country and party (and other custom tags). This information is available to logged in users via API and bulk download.
Measure 28.3	
QRE 28.3.1	Who Targets Me will collaborate with EDMO on the consultation, if invited to do so.

VI. Empowering the research community	
Commitment 29	
Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences.	
Measure 29.1	
QRE 29.1.1	We are committed to sharing our research and policy thinking, via our blog, as and when it is published. This quarter, we will publish some analysis of the 2022 US midterm elections.
QRE 29.1.2	Who Targets Me will publish research via the Transparency Centre.
QRE 29.1.3	Who Targets Me will inform members of the Taskforce about any relevant research activities we conduct, as well as sharing these activities and outcomes with the broader public once they are available.

SLI 29.1.1 - reach of stakeholders or citizens informed about the outcome of research projects	Who Targets Me will report on the reach of the stakeholders informed about the projects' outcome.
Data	N/A
Measure 29.2	
QRE 29.2.1	Who Targets Me commits to providing reports on any future research around resilience-fostering measures that it undertakes. This includes our projects with the University of Manchester and the Max Planck Institute in Berlin.
QRE 29.2.2	For any relevant upcoming research projects, including work around transparency labelling, Who Targets Me will update the research in the Transparency Centre once it is available.
QRE 29.2.3	We will share relevant information as and when it is published.
SLI 29.2.1	We will share relevant information as and when it is published.
Data	N/A
Measure 29.3	
QRE 29.3.1	Who Targets Me will share updates via the Transparency Centre. Who Targets Me will share relevant information when available.
SLI 29.3.1 - reach of stakeholders or citizens informed about the outcome of research projects	
Data	N/A

VIII. Transparency Centre	
Commitment 34	
To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website.	
Measure 34.1	
Measure 34.2	
Measure 34.3	
Measure 34.4	
Measure 34.5	

VIII. Transparency Centre	
Commitment 35	
Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable.	
Measure 35.1	
Measure 35.2	
Measure 35.3	
Measure 35.4	
Measure 35.5	
Measure 35.6	

VIII. Transparency Centre

Commitment 36	
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner.	
Measure 36.1	
Measure 36.2	
Measure 36.3	
QRE 36.1.1 (for the Commitments 34-36)	[Joint Statement with other signatories] We are pleased to confirm that we have participated in the subgroup that has successfully launched the common Transparency Centre this year. We have assisted with establishing the website's requirements, selecting a vendor to build the website and overseeing the development of the website's key functionalities and interface. We have ensured that the Center will allow the general public to access general information about the Code as well as the underlying reports (and for the Center to be navigated both by commitment and signatory). Each signatory will be responsible for ensuring that the information they upload to the website is correct and accurate. Entities interested in joining the Code's task-force will be able to sign up through a dedicated online application form on the website.
QRE 36.1.2 (for the Commitments 34-36)	Who Targets Me, in collaboration with Signatories, will make sure to outline any changes to the Transparency Centre's content, operations, or functioning in its reports over time.
SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage	Who Targets Me, in collaboration with Signatories, will provide meaningful quantitative information on the usage of the Transparency Centre, as relevant data becomes available over time.
Data	

IX. Permanent Task-Force	
Commitment 37	
Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus.	

Measure 37.1	
Measure 37.2	
Measure 37.3	
Measure 37.4	
Measure 37.5	
Measure 37.6	
QRE 37.6.1	During the reporting period, Who Targets Me attended various meetings with the Ad Scrutiny and Transparency Centre sub-groups to engage in discussions around the implementation of agreed commitments. Moving forward, we plan to continue to attend relevant sub-group discussions and plenary sessions, and carry out work to meet the Code's commitments.

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 will make resources available for ensuring Code compliance proportionate to our size and ability, and in relation to the efforts of other signatories. As a small organisation, we are constantly assessing our progress towards implementing our commitments, and are working on expanding the scope of our tools as quickly as possible to cover more Member States across the EU.

X. Monitoring of Code	
Commitment 39	
Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble. [change wording if adapted]	

X. Monitoring of Code

Commitment 40

Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each Signatory, service and at Member State level.

Measure 40.1	
Measure 40.2	
Measure 40.3	
Measure 40.4	
Measure 40.5	
Measure 40.6	

X. Monitoring of Code

Commitment 41

Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO.

Measure 41.1	
Measure 41.2	
Measure 41.3	

X. Monitoring of Code

Commitment 42

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce.

X. Monitoring of Code

Commitment 43

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce.

X. Monitoring of Code

Commitment 44

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce.