



European
Data Protection
Board



27 March 2026

Stakeholder event on EDPB Guidelines on the processing of personal data to target or deliver political advertisements – discussion paper

1 Introduction

Following the adoption of Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising, new legal frameworks have been established governing the use of targeting and ad delivery techniques for online political advertising based on the processing of personal data.

That Regulation, in particular Chapter III, supplements Regulation (EU) 2016/679 and Regulation (EU) 2018/1725 for the processing of personal data in the context of political advertising, with the aim of ensuring respect for fundamental rights, including the right to the protection of personal data. Pursuant to Article 22(2) of Regulation (EU) 2024/900, the European Data Protection Board is empowered, on its own initiative or at the request of the European Commission, to prepare guidelines for the purpose of assisting supervisory authorities in assessing compliance with the requirements of that Regulation, in particular as regards the application of Articles 18 and 19.

In the context of the preparatory work on those guidelines, and in order to gather information on market practices in the area of targeting and ad delivery of online political advertising, the EDPB has organised a remote stakeholders' event on 27 March 2026 and has prepared this list of questions for discussion between stakeholders.

2 Questions to stakeholders

TARGETING PRINCIPLES

Q1. How have data processing practices for online political advertising evolved since the regulation's entry into force, and what actions did you implement to ensure compliance with Article 18? Which concepts or obligations related to Articles 18 of the regulation would benefit from further guidance from the EDPB?

Q2. What, in your view, are the best practices to follow to support compliance with Article 18? For example, what actions should be recommended to mitigate risks for processing special categories of personal data in the context of targeting, and how is the distinction between permissible personalisation and prohibited profiling usually approached in the market?

Q3. How is personal data for political targeting collected, and what mechanisms are used to obtain explicit consent and prevent the targeting of individuals within one year of voting age? What types of “equivalent alternatives” are generally offered and how is the withdrawal of consent to political advertising targeting implemented in practice?

TRANSPARENCY AND DOCUMENTATION OBLIGATIONS (Art. 19(1))

Q4. Which concepts or obligations related to Articles 19 of the regulation would benefit from further guidance from the EDPB?

Q5. What, in your view, are the best practices to follow to support compliance with the transparency obligations? How are AI systems used for in the targeting or ad delivery of the political advertising and what, in your view, are the best practices for communicating this information to data subjects?

Q6. What categories of personal data are generally processed for the purpose of delivering political advertisements, and what types of risks are typically considered when preparing an internal annual risk assessment under Article 19(1)(d)?

COOPERATION AND INFORMATION EXCHANGE IN THE SUPPLY CHAIN (ART. 19(2) AND ART. 19(3))

Q7. What standards and procedures are generally applied to ensure timely and accurate information exchange between controllers, publishers, and providers of political advertising services? In your experience, which roles do these parties tend to play within the data protection framework (e.g. controller/joint-controller/processor) and what practical arrangements have you put in place to manage the flow of information between those actors?

Q8. How should coordination between multiple publishers take place in practice, in particular, regarding their transparency obligations?