



**Results of the monitoring of platform functionalities in
relation to the 2024 European elections**

and

**a comparative analysis of selected results of monitoring
exercises in relation to elections held in the Slovak
Republic in 2023 – 2024**

Council for Media Services

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ABSTRACT

This monitoring report consists of two parts:

PART I – Results of the monitoring of platform functionalities in relation to the 2024 European elections.

PART II – A comparative analysis of selected results of monitoring exercises in relation to elections held in the Slovak Republic in 2023 – 2024.

In frame of **PART I**, the Council for Media Services (“CMS”), by virtue of its statutory powers and in the light of its direct experience acquired during the snap Elections to the National Council of the Slovak Republic in 2023 and the Election of the President of the Slovak Republic in 2024, actively monitored the functionalities of Facebook, Instagram, TikTok and YouTube throughout the campaign period leading up to the Elections for the European Parliament taking place from 6 to 9 June 2024 (8 June 2024 for the Slovak Republic). The CMS’s monitoring exercise focused on potential breaches of the Act on Media Services (“AMS”), fulfilling the commitments under the Code of Practice on Disinformation (“Code”) and compliance with obligations under the Digital Services Act (“DSA”). The CMS further examined how the monitored platforms took into consideration the Regulation on the transparency and targeting of political advertising (“TTPA”) in the context of the elections in the Slovak online environment, as well as the Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35(3) of Regulation (EU) 2022/2065 (“Guidelines”). This report provides a description of activities carried out in the preparatory phase, the monitoring itself and data collection, evaluation of findings and the subsequent identification of potential gaps.

This monitoring exercise, focused on platforms’ functionalities in the context of the European elections, was carried out in two phases, during which the CMS conducted data collection (May to July 2024) and subsequently analysed the collected data, including it in the final report (July to September 2024). In frame of the data collection, the CMS continuously monitored the platforms on its own initiative, as well as in response to alerts received from other government authorities. After the end of the monitoring period, the CMS sent out a questionnaire to the platforms containing questions concerning meeting the requirements.

The above-mentioned activities of the CMS resulted in the following findings:

- The CMS did not record any occurrences of content that would meet the criteria of illegal content as defined by the AMS.
- In relation to the elections, the CMS did not receive any complaints from the members of the public regarding the coverage of the elections on social media.
- Evaluation of the platforms’ activities in the context of the European elections highlighted differences in their approach. TikTok and Google proved to be the most active in areas such as raising users’ awareness of electoral processes, as well as activities aimed at preventing the spread of disinformation and promoting media literacy, with their respective measures evaluated as sufficient. In contrast, Meta did not respond to the questionnaire, thus hindering a comprehensive assessment.
- Formally, all monitored platforms implemented the Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to article 35(3) of the DSA; Article 27(e) of this Regulation states that political advertisements must be labelled in a clear, salient and unambiguous manner and in real time.

As a part of the monitoring of the platforms based on its own capacities and on alerts from other government authorities during the election campaign, the CMS identified the following gaps:

- Meta Ad Library lacked translations into Slovak and Google Transparency Center lacked advertisers' contact details.
- As a part of its active monitoring, the CMS detected dissemination of content in form of a deepfake video created by using of artificial intelligence tools, which presented false and inauthentic information about one of the candidates running in the European elections. This content was detected on Facebook and TikTok, and the operators of these services (Meta and ByteDance) removed the content within a few hours of being informed by the CMS about its presence on their services.

The results of the monitoring might serve as inspiration for EU Member States. Simultaneously, they could provide feedback to the Code and its working groups, in particular in terms of evaluating its effectiveness at national and European level. This monitoring report also offers the first reflections on the effectiveness of implementation of the TTPA in the context of the Slovak online environment. Furthermore, these results can serve as a cornerstone for the role of the CMS as the Digital Services Coordinator ("DSC") in Slovakia.

The **PART II** is a comparative analysis conducted by the CMS comparing the results of monitoring exercised related to three consecutive electoral processes in the Slovak Republic – the snap elections to the National Council of the Slovak Republic in September 2023, the first and second rounds of the Election of the President of the Slovak Republic in May and April 2024, and the Elections to the European Parliament in June 2024.

The comparative analysis focused on the functionalities of Facebook, Instagram, TikTok and YouTube during the three election campaigns run before and during the above-mentioned electoral processes in the Slovak Republic from September 2023 to June 2024. The analysis examines aspects such as potential breaches of the Act on Media Services ("AMS"), compliance with commitments under the Code of Practice on Disinformation ("Code") and with obligations under the Digital Services Act ("DSA"), offering an overview of how the monitored platforms reacted to the elections conducted in the respective periods, as well as the problematic aspects brought on by the electoral processes at this time.

The results of the comparative analysis describe:

- evaluation of the platforms' activities prior to the European elections, particularly in the context of raising users' awareness of electoral processes, implementation of activities to promote media literacy and prevent the spread of disinformation, as well as activities aimed at compliance with the rules on transparency of political advertising or the electoral silence period;
- comparison of typical attributes of ad libraries and individual political advertisements displayed in user interfaces, along with the gaps identified in the functionalities of each platform during the monitored election campaigns;
- comparison of the platforms' approach to moderation of potentially problematic content interfering in the election campaigns.

PART I – Results of the monitoring of platform functionalities in relation to the 2024 European elections

FOREWORD

In relation to the Elections to the European Parliament held from 6 to 9 June 2024 (“European elections”), the Council for Media Services (“CMS”) followed up on the previous monitoring exercises for the snap Elections to the National Council of the Slovak Republic in 2023¹ (“Parliamentary elections”), the 2024 Election of the President of the Slovak Republic² (“Presidential election”) and the 2019 European elections, the latter being a part of the joint monitoring within the European Regulators Group for Audiovisual Media Services (“ERGA”), and updated its monitoring efforts in respect of the Code of Practice on Disinformation³ revised in 2022 (“Code”).

The mission of the CMS is to promote the public interest in the exercise of the right to information, freedom of expression, and the rights of access to cultural values and education, as well as to perform state regulation in the areas of broadcasting, retransmission and the provision of on-demand audiovisual media services.

In addition, the CMS uses its powers conferred on it under the Act on Media Services (“AMS”)⁴ to cooperate with the most widely used online platforms in Slovakia. The CMS started collecting data on 3 June, one week before the date of the European elections (the European elections were held on 8 June 2024 in the Slovak Republic) and continued the monitoring exercise until the end of the elections on 9 June. During this period, the CMS actively monitored the functionalities of digital platforms. The CMS focused in particular on possible breaches of the AMS as well as on compliance with commitments under the Code and the obligations of very large online platforms under the Digital Services Act (“DSA”).⁵ Furthermore, the CMS closely monitored the transparency of political advertisement provision on these platforms, information available to users in the ad libraries, and actions increasing the users’ awareness of the electoral processes. The CMS also examined the implementation of provisions of the Regulation on the transparency and targeting of political advertising (“TTPA”)⁶ applicable in this period, as well as the Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35(3) of Regulation (EU)

¹ CMS monitoring report: [Monitoring of platform functionalities in relation to the 2023 Elections to the National Council of the Slovak Republic](#).

² CMS monitoring report: [Results of monitoring of platform functionalities in relation to the 2024 Election of the President of the Slovak Republic](#).

³ The [Code of Practice on Disinformation](#) (“Code”) is the first tool of its kind used by multinational online companies since 2018, committing them to comply with self-regulatory standards to eliminate the spread of disinformation. The original Code required a revision, coordinated by the ERGA working group lead by the former director of the Council for Broadcasting and Retransmission Ľ. Kukliš. In June 2022 a new text of the Code was presented, containing 44 commitments and 128 specific measures, including demonetization for purveyors of disinformation, transparency of political advertising, elimination of manipulative behaviour (e.g. fake accounts, use of bots and deepfake technology), empowerment of users, researchers and the community of independent fact-checkers. Furthermore, the Code is expected to become a part of a broader regulatory framework formed by the DSA and upcoming legislation governing transparency and targeting of political advertising.

⁴ [Act No. 264/2022 Coll. on media services](#) (“AMS”).

⁵ [Regulation 2022/2065 of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC \(Digital Services Act\)](#).

⁶ [Regulation \(EU\) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising](#).

2022/2065("Guidelines")⁷. Simultaneously, the CMS focused on previously identified problematic aspects that emerged from previous monitoring exercises of the CMS conducted during the campaign period leading up to the Parliamentary elections in autumn 2023 and the Presidential election in March and April 2024. This report provides a comprehensive overview of the conducted monitoring exercise and a summary of the activities carried out by the CMS to ensure a transparent and fair digital media environment in the context of the 2024 European elections in the Slovak Republic.

1 BACKGROUND

The competences of the CMS as the Slovak national regulatory authority responsible for media oversight and enforcement of regulatory frameworks related to potentially illegal content on content-sharing platforms are governed by the AMS.

Under the AMS, the CMS is entrusted with the responsibility and legal competence to prevent the dissemination of illegal content on content-sharing online platforms. In this context, Article 151(2) of the AMS defines what constitutes illegal content online (the relevant definition deriving from Act 300/2005 Coll., i.e. the Penal Code).

For the purposes of the Act on Media Services, illegal content refers to content which:

- exhibits the characteristics of child pornography or extremist material,
- incites an act exhibiting the characteristics of any of the terrorist offences,
- approves of a conduct exhibiting the characteristics of any of the terrorist offences, or
- exhibits the characteristics of the criminal offence of denial and condoning of the Holocaust, crimes of political regimes and crimes against humanity, criminal offence of insult of the State, race and belief or criminal offence of incitement to national, racial or ethnic hatred.

Furthermore, under Article 110(3)(q) of the AMS, the CMS is empowered to cooperate with online content-sharing platforms ("platforms") to ensure efficient, proportionate and non-discriminatory application of the rules for the provision of their services. Based on this power, the CMS has established bilateral communication channels with representatives of the individual companies operating these platforms, which are actively used to communicate cases of potentially illegal content or content potentially violating the rules for using the platforms.

Additionally, the CMS acts as a contact point for communication between the government authorities and operators of the most widely-used platforms in Slovakia (Facebook, Instagram, YouTube, TikTok).⁸ In practice, this means that government authorities and institutions, which also carry out monitoring of social network content based on their designated competences, report potentially problematic content⁹ to the CMS, which subsequently communicates this content/these systemic elements to the respective platform within its remit.

The CMS actively monitored and analysed functionalities of the platforms in relation to the 2024 European elections for several reasons. Firstly, the CMS paid special attention to possible

⁷ [Commission Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to Article 35\(3\) of the DSA.](#)

⁸ The level of popularity of the platforms in Slovakia was confirmed by the transparency reports prepared under the DSA, published at the end of October 2023.

⁹ Potentially problematic content refers to content which is evaluated by the CMS as potentially violating terms and conditions (e.g. Community Standards, Terms of Use, etc.) of the platforms and which simultaneously does not exhibit the characteristics of illegal content as defined by the AMS. For such content, the CMS has no authority to initiate administrative proceedings or use other administrative tools to enforce the removal or restriction of the content.

violations of the AMS and the dissemination of potentially illegal content on content-sharing online platforms. Another reason underlying the monitoring was to examine the implementation of the obligations imposed on platforms by the Code, as well as the new obligations imposed on very large platforms (“VLOPs”) and very large online search engines (“VLOSEs”) under the DSA. The CMS examined whether online platforms actively updated their ad libraries to include comprehensive information about political and issue advertisements, thereby ensuring transparency and accessibility of information to the public, in line with the applicable legislation (DSA) and the commitments under the Code.

According to the DSA, very large online platforms and very large online search engines (“VLOPSEs”) shall analyse and mitigate the risks to European society posed by their design and operation. The DSA requires VLOPSEs to take due diligence measures, particularly regarding transparency and user empowerment vis-à-vis these platforms. In the context of online advertising, VLOPSEs are required, under Article 27 of the DSA, to clearly label paid advertising and to ensure that the user is able to identify who is presenting the advertisement and who is paying for it. In accordance with Article 39 of the DSA, VLOPSEs are also required to compile and make publicly available an ad repository (“ad library”) containing all active advertisements and advertisements presented on the platform’s online interface for the past year.

The Code has become part of the broader regulatory framework formed by the DSA and the new TTPA Regulation which took effect on 13 March 2024. The signatories of the Code, including all the platforms mentioned in this report, are bound by several specific commitments. In the Code, the platforms have declared (Commitments 4 to 11) that they will contribute to enhancing the transparency of political advertising online through transparent labelling of political advertising, verification of information about the sponsor of political advertising, and the availability of information about political advertising to the average user (e.g. in an ad library). Furthermore, the Code obliges platforms to implement preventive and awareness-raising activities aimed at the public to increase media literacy and the ability of users to identify disinformation (Commitments 17 and 21).

During the European elections (June 2024), only Articles 3 and 5(1) of the TTPA, defining general concepts and setting out requirements for the non-discriminatory distribution of political advertising across the European Union territory, were effective. At the time of the elections, the provisions defining the rules for the labelling of political advertising (in particular Articles 11 and 12) were not yet effective (and are to enter into force and become applicable and enforceable in October 2025).

In relation to the elections, the European Commission issued Guidelines for platforms which, inter alia, recommend in article 27(e) to VLOPs and VLOSEs to ensure that political advertisements are labelled in a clear, salient and unambiguous manner and in real time, to allow users to understand that the content displayed contains political advertising. The European Commission Guidelines further call on platforms to provide users with additional information about the political advertising displayed, such as the sponsor identity; the period during which the political advertisement is to be published; the aggregate amounts received by the providers of political advertising services; and to maintain a publicly available, searchable repository of political ads, updated in as close as possible to real-time, which also includes, as a minimum, the total number of recipients of the service reached and, where applicable, the aggregate numbers broken down by Member State for the group or groups of recipients that the advertisement specifically targeted.

In this context, the CMS also monitored the steps taken by the platforms to raise citizens’ awareness of the electoral processes. The CMS focused on initiatives aimed at providing the public with relevant and reliable information about the conduct of the elections or to warn them against the dissemination of false or manipulative information about electoral processes.

2 RESULTS OF THE MONITORING EXERCISE

2.1 Data collection

The project of monitoring the platforms' functionalities in the context of the European elections consisted of two phases, during which the CMS carried out data collection (May to July 2024) and subsequently analysed the collected data, including it in the final report (July to September 2024). The CMS followed up on the monitoring exercises successfully carried out in autumn 2023 and in spring 2024 in the context of the Parliamentary elections and the Election of the President of the Slovak Republic respectively.

The CMS analysts started collecting data on 3 June 2024 (the European elections in the Slovak Republic were held on 8 June 2024, i.e. data collection started in the week preceding the Slovak elections). Throughout this period, the CMS continuously monitored the platforms on its own initiative as well as in response to notifications received from other government authorities. Please note in this context that the overall intensity and character of the campaign leading up to the European elections was affected by the attempted assassination of the Prime Minister of the Slovak Republic, Robert Fico, on 14 May 2024, i. e. when the election campaign was gaining in intensity. In response to this event, most political parties decreased the intensity of their campaign activities.

Similarly to the monitoring of platforms in relation to the Elections to the National Council of the Slovak Republic and the Election of the President of the Slovak Republic, the CMS sent a questionnaire to the providers of the monitored platforms in order to obtain additional data for the evaluation of the platforms' functionalities. The questionnaire, the structure of which is described in the next section of this report, was sent to platforms on 20 June 2024. Google and ByteDance responded to the questionnaire by 19 July 2024. Following repeated requests, Meta responded to the CMS on 7 August 2024, stating that all communication regarding the European elections was conducted at the level of Meta and with the relevant authorities at the level of European Commission, and therefore it would not reply to the CMS's questionnaire regarding the European elections.

2.2 Evaluation of platform functionalities (in the context of user awareness and media literacy activities)

In the light of the above-mentioned competences of the CMS and its experience with monitoring the functionalities of platforms prior to the European elections, the CMS carried out monitoring of the functionalities of platforms aimed at strengthening the users' awareness of the electoral processes (via official sources of information, i.e. the Ministry of the Interior of the Slovak Republic) and activities aimed at development of media literacy. The following evaluation is based on the monitoring exercise conducted by the CMS in May and July 2024, and on the replies of Meta, Google and ByteDance provided in response to the questionnaire distributed by the CMS in the second half of June 2024. Of the three providers addressed, only Google and ByteDance responded to the questionnaire. In its exchanges with the CMS, Meta stated that it decided not to respond to the questionnaire, as it is preparing to publish its own report in September 2024, providing an EU-wide overview of its activities in the context of the European elections. The evaluation of Meta's activities was therefore only carried out where the CMS was able to obtain information via its own monitoring efforts.

The monitoring exercise as well as the subject focus of the questionnaire were based on the structure established during the monitoring of the Elections to the National Council of the Slovak Republic and the Presidential election. The following section describes how the platforms used information panels and other features to increase users' awareness of the electoral process; how they monitored the transparency of political advertising and compliance with the electoral

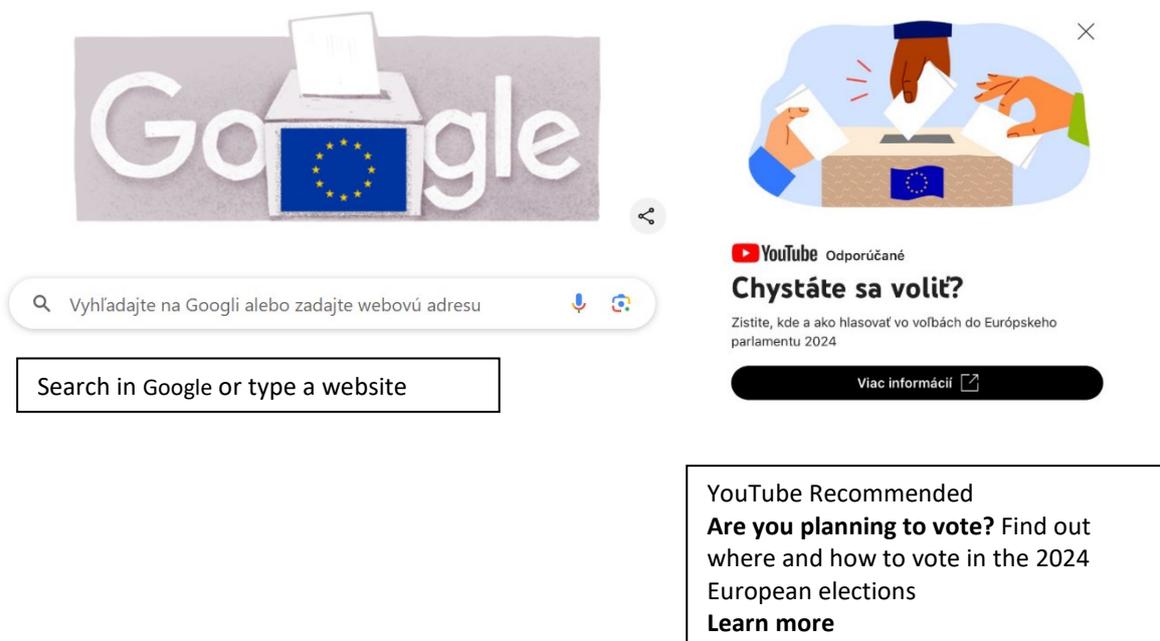
silence period; the activities they carried out to prevent the spread of disinformation and to promote media literacy; the conduct of content moderation and cooperation with independent fact-checkers; and whether the platforms carried out other relevant activities during the European elections period.

The evaluation of the functionalities and responses of content-sharing platform operators to the questions included in the questionnaires was carried out by four CMS analysts, focusing on different areas (e.g. media literacy, problematic content, etc.). The evaluation method combined analysis of data provided by the platforms as well as findings from monitoring of the election campaign (e.g. response time needed by platforms to respond to reported problematic content). A four-point scale was used, complemented by verbal comments from the assessor. This resulted in a comprehensive scoreboard including textual comments for each area.

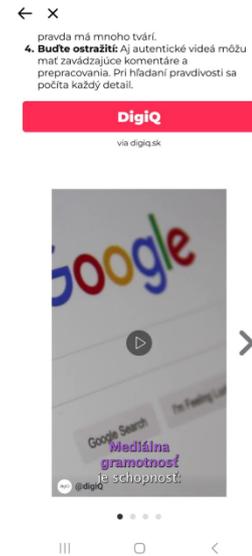
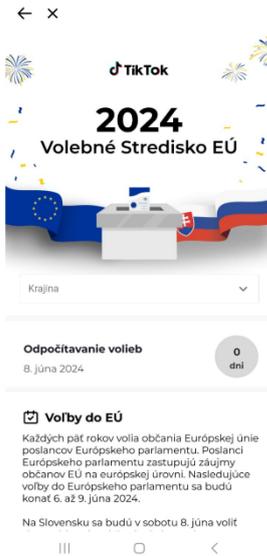
AREA/PLATFORM	TIKTOK	META	GOOGLE
INFORMATION PANELS AND FEATURES	Sufficient	Mostly insufficient	Sufficient
POLITICAL ADVERTISING AND ELECTORAL SILENCE PERIOD	N/A	N/A	Mostly insufficient
ACTIVITIES TO PREVENT THE SPREAD OF DISINFORMATION AND TO PROMOTE MEDIA LITERACY	Sufficient	N/A	Sufficient
CONTENT MODERATION AND COOPERATION WITH INDEPENDENT FACT-CHECKERS	Mostly sufficient	Mostly sufficient	Mostly sufficient
OTHER ACTIVITIES	Mostly insufficient	N/A	Sufficient

2.2.1 Information panels and other features aimed at increasing users' awareness of electoral processes

Google provided information on how to vote, including requirements related to identification, registration, time limits, voting from abroad, and various forms of voting. This information was available on the search result pages and on the main page of Google.sk during the key days of the election period (from 9 May to 8 June). YouTube presented information about the elections through panels of reliable sources displayed on the main page – in the search results and in the “Up Next” section. In addition, information panels were shown on YouTube next to the candidates and the election results (from 22 April to 27 June). Google also published a special Google Doodle that redirected users to election-related search results. Content covered by the information panels and voter information was extensive and detailed. Google provided voters with important and relevant information about the elections using different platforms, ensuring a high level of visibility and accessibility of this information. In addition, Google provided information on the number of impressions (115 million impressions for Google Search and more than 1.1 billion interactions for YouTube campaigns and panels across the EU). Overall, the content covered by the information panels and information about the elections can be assessed as sufficient.



From 28 March to 17 June, TikTok presented information about the European elections to its users through several channels. The platform launched the Election Hub containing useful information about the elections. The information provided had been produced in cooperation with the European Commission, the European Parliament, national electoral authorities, fact-checkers and civil society organisations. Furthermore, the Election Hub contained content aimed at promoting media literacy, which is evaluated in the following sections of this report. The election information panels were linked to search results for election-related keywords, as well as videos and live streams. Based on its questionnaire reply, TikTok reports that the Election Hub created for Slovak users of the platform reached more than 55,900 visits. Overall, the content covered by the information panels and information can be assessed as sufficient.



TikTok 2024 EU Election Hub
Election countdown – 0 days

Every five years, the EU citizens elect the Members of the European Parliament. The Members of the European Parliament represent the interests of EU citizens at European level. The Elections to the European Parliament will be held from 6 to 9 June 2024. These elections will take place in Slovakia on Saturday 8 June.

EU Elections
 Every five years, the EU citizens elect the Members of the European Parliament. The Members of the European Parliament represent the interests of EU citizens at European level. The Elections to the European Parliament will be held from 6 to 9 June 2024. Slovakia will elect the Slovak Members of the European Parliament for the period 2024 – 2029 on Saturday 8 June.
Learn more about EU Elections

How to vote
 Slovak citizens aged 18 or older with permanent residence in Slovakia, as well as citizens of other EU Member States who meet this age requirement and permanently reside in Slovakia have the right to vote in the European elections.

Slovak citizens who are 18 years of age or older and do not have permanent residence in Slovakia or in another EU Member State, but are present in Slovakia on the day of the elections, are also entitled to vote in the European elections.

A voter can vote in Slovakia in the electoral district in which they are registered. Voting in another electoral district is possible

when using a voter's card or a Slovak travel document, if they don't have a permanent residence in Slovakia or in another EU Member State.
Click here to learn more

Why is it important to vote?
 By voting in the European elections, you can decide what the European Union will focus on in the next five years. Sign up for our election newsletter to make sure you don't forget to use your vote in June!
Click here to learn more
Remind me to vote

...the truth has many faces.

4. Be careful: even authentic videos can include misleading comments and alterations. When searching for the truth, every detail counts.
DigiQ

Although Meta did not respond to the questionnaire, during the monitoring of the platforms' functionalities in relation to the European elections the CMS collected information on its activities aimed at informing the public about the electoral processes. Election information panels were present on both Facebook and Instagram, drawing users' attention to the election date and providing a link to the relevant authority's webpage containing more details. As Meta did not respond to the questionnaire, we cannot confirm the period during which users were shown the information panels or the number of interactions. Based on the information obtained and compared to other platforms' activities, Meta's activities were evaluated as mostly insufficient.



Get ready for the elections in Slovakia
 Read the official information about voting in the European elections held on 8 June
 We value your privacy. Find out how Facebook is sharing this reminder.
 Learn more
See information about the elections

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2.2.2 Transparency of political advertising and compliance with the electoral silence period

In response to the question about restrictions imposed on published political advertisements, Google cited general principles for assessing potential infringements in relation to Google Terms of Service. However, its reply did not include any specific details about the period examined or the European elections as the subject. Google states that all political advertisements are labelled with a “disclaimer”, such as “sponsored by” or “paid for by”. Google also stated that sponsors of the political advertisement are required to disclose if the content (or its components) is created using AI tools (“synthetic content”/“partially altered content”). It may take 48 to 72 hours from the time of submitting the advertisement for the information to appear in the ad library. As Google provided only general information and failed to reply to some of the questions in the questionnaire in detail (e.g. the number of advertisements that were removed or restricted), Google’s activities were evaluated as mostly insufficient.

TikTok does not officially allow political advertising; no sponsored content that could be considered political advertising was recorded during our monitoring exercise.

2.2.3 Activities to prevent the spread of disinformation and to promote media literacy

In cooperation with DigiQ, TikTok developed educational videos for Slovak users. These videos were aimed at helping users distinguish disinformation and verify facts. They were available in the Slovak-language Election Hub launched by TikTok at the end of March 2024. The aim of this hub was to serve as a source of verified information about the elections. Overall, it was concluded that TikTok fulfilled its commitment under the Code regarding activities aimed at promoting media literacy.

Prior to the European elections, on 15 May, Google, Jigsaw and their partners launched a five-week long initiative focusing on disinformation prevention in all EU languages, including Slovak.

According to Google, preliminary results show that these advertisements led to a significant increase in viewers' capacity to identify manipulative tactics. Further analysis and research are ongoing and final results will be available in autumn 2024. Overall, we welcome the creation of a campaign tailor-made for the elections. In 2022, YouTube launched a global media literacy campaign entitled "Hit Pause", which remains available across the EU and in the official EU languages. The goal of this program is to help viewers acquire critical thinking skills in the context of media literacy through engaging and educational messages. This campaign was evaluated as neutral in our previous reports as it was impossible to identify its impact. However, we welcomed the fact that at the time of the European elections a new Hit Pause campaign banner was launched, highlighting how media literacy skills can help keep people informed during the elections, although its reach remained unknown.

The media literacy activities carried out by Google and ByteDance prior to the European elections were evaluated as sufficient.

[Joint campaign of the European Commission and the European Regulators Group \(ERGA\)](#)

In the period leading up to the European elections, the European Commission implemented a series of measures to raise awareness of the risks related to disinformation and foreign manipulation and interference. Together with the European Regulators Group for Audiovisual Media Services (ERGA), which brings together all national independent regulatory bodies in the field of audiovisual services in the EU, it created a joint communication campaign entitled "Check your sources, your choices matter" to enhance critical thinking among citizens and provide practical advice on how to identify and combat disinformation. The video campaign ran in all Member States and was available in 24 official EU languages until the beginning of June.

Based on the information available to the CMS, all monitored platforms joined this campaign in various ways, as required by their obligations under the Code. TikTok included a link to ERGA's profile in its Election Hub, along with a video in English. Google posted a video on a website that was part of a campaign for the European elections, containing information about verification of sources. A link to the video was also placed in the monthly newsletter on "Fighting Misinformation Online", distributed to more than 2,000 recipients. Google and Meta also provided advertising space to share the video campaign on YouTube, Facebook and Instagram. As a result, the campaign reached a total of more than 640 million impressions in the EU.¹⁰

[2.2.4 Content moderation and cooperation with independent fact-checkers](#)

TikTok stated in its questionnaire reply that it intervened against content in more than 31,000 instances during the monitoring period. Over this period, the CMS reported only two cases of content directly related to the elections to the platform. These were both deepfake videos created using AI, and the platform's response was extremely rapid, with both videos being evaluated as violating the platform's rules and subsequently removed on the same day.¹¹ TikTok further reported that together with its partner, it verified the authenticity of 18 types of content and claims during the election period that could have been considered disinformation. If this content could not be verified, TikTok applied an "unverified content" label to the post. Based on the data provided, we confirmed that TikTok successfully intervened against accounts that violated the platform's terms of use. These usually belonged to persons who had not reached the required age limit. The platform did not increase its capacities of independent fact-checkers for the Slovak market during the monitored period. However, additional internal resources were made available during the election weekend. Despite the platform's rapid content moderation

¹⁰ Microsoft, Snapchat and X also contributed to the dissemination of the video campaign.

¹¹ The content of these videos is described in detail in Chapter [2.7 Deepfake videos created using AI technology](#).

and the additional data provided, TikTok's activities were evaluated as mostly sufficient, as there had been no increase in the capacity of independent fact-checkers.

In its questionnaire reply, Google provided the CMS with fairly detailed information regarding the moderation of content on its services, including YouTube and Google Search. However, this information is very general and comes from the transparency reports provided as a part of the DSA obligations. Also, covering the period from 11 September 2023 to 29 February 2024, it does not reflect the monitoring period of the European elections. During the examined period, the CMS reported four YouTube posts to Google, none of which were related to the elections. The company further stated in its questionnaire reply that, similarly to TikTok, Google did not increase the number of independent fact-checkers. However, it added that in addition to its financial contribution to the European Media and Information Fund, aimed at increasing media literacy and combating disinformation, it funded 70 other projects in 24 countries, including the Central European Digital Media Observatory (CEDMO). As Google did not provide details on content moderation during the examined period and the CMS does not have any relevant data at its disposal, these activities were evaluated as mostly sufficient based on the information regarding cooperation with fact-checkers.

As Meta did not respond to the questionnaire, the assessment is based only on the data available to the CMS. The CMS reported to Meta over 300 individual pieces of content¹² during the monitoring period, but only one content was directly related to the elections. This content was identical (deepfake video) to the content that had been reported to TikTok. Meta's response to this notification was comparable to TikTok's, and the content was removed on the day it was reported. As for cooperation with fact-checkers, the CMS did not obtain any updates as compared to the previous reports. Based on the available data, this part was therefore evaluated as mostly sufficient.

2.2.5 Other relevant activities during the European elections

In preparation for the European elections, Google organised several activities to combat disinformation and trainings for journalists. In cooperation with the Central European Digital Media Observatory (CEDMO), Google supported the publication of reports on disinformation trends in Central and Eastern Europe, including Slovakia. Furthermore, the Google News Initiative, in cooperation with the Czech News Agency, continued organising trainings for Slovak and Czech journalists to prepare them and increase their resistance to the spread of false information before the elections. Google also organised the CEE Fighting Disinformation Grantees Meetup on 22 April 2024 in Warsaw, bringing together representatives from various organisations active in the fight against disinformation. Three hundred experts attended Fighting Misinformation Online (FMO), a conference focusing on election integrity and the role of artificial intelligence, held on the following day. Google also participated in several technical meetings with the European Commission on election preparations and tackling disinformation. Based on the information provided, these activities were evaluated as sufficient.

TikTok stated in its questionnaire reply that prior to the European elections, it conducted an internal meeting as a part of the Election Speaker Series focusing on Slovakia. This meeting was reportedly held with the internal team and the fact-checking organisations to share relevant information in preparation for the elections. However, TikTok did not provide further details in

¹² The CMS reported to Meta content potentially violating the platform's terms of use, mainly violations of authentic identity rules, fake advertisements and fraud or hate speech. However, this content was not directly related to the elections and was detected by the CMS in frame of its routine monitoring in cooperation with other authorities.

its questionnaire reply about the date of the meeting or the participating organisations. Therefore, the implemented activities were evaluated as mostly insufficient.

2.3 Activities of the regulator and the *Platform Media Literacy+* in relation to the European elections

The CMS also engaged in activities to prevent the spread of disinformation and to promote media literacy in the context of the European elections. As an active member of ERGA, the CMS participated in the preparation of the above-mentioned joint European campaign entitled “Check your sources, your choices matter” and supported its dissemination in Slovakia.¹³ Subsequently, the Slovak version of the video campaign was published on its YouTube channel and on the social networks of the *Platform Media Literacy+*.¹⁴ In addition to the campaign video, other posts were published on the platform’s social media to promote the citizens’ critical thinking and awareness of the elections.

In addition, the CMS prepared a special edition of the newsletter.¹⁵ It provided an overview of the activities of the members of *Platform Media Literacy+* aimed at contributing to increased awareness and supporting critical thinking of voters. This was also the goal of *Platform Media Literacy+* members and their activities in the online environment, using their own profiles on TikTok, Instagram, Facebook and YouTube.

Zmudri focused on explaining the importance of the European elections and the practical aspects of voting in a simplified and accessible way, helping to raise awareness of the electoral process and options for citizens living abroad. *Fakescape* shared useful tips and reasons why it is important to participate in the elections in order to encourage voter engagement and raise awareness of the importance of the European Parliament. *Demagog.SK* focused on fact-checking and analysis of political debates, helping voters obtain accurate and critically reviewed information about candidates and their statements. *Infosecurity* provided analyses of security concerns and disinformation campaigns, highlighting potential threats and the need to exercise caution when searching for information. *Rada mládeže Slovenska* (The Slovak Youth Council) encouraged young people to participate in the elections, boosting their interest in political issues and thus promoting their active involvement and reflection on the importance of their vote. *MEMO 98* shared posts containing basic information about the elections, practical advice for voters and analyses of important election issues, with an emphasis on verifying facts and avoiding disinformation. Furthermore, it created an online election calculator to help voters understand their voting options and make decisions based on relevant information.¹⁶

In addition to the above-mentioned organisations, there were other members of the platform whose activities contributed to promoting critical thinking and awareness of the European elections. In the future, we envision focusing on organizing joint campaigns to achieve a broader impact and reach voters more effectively. It must also be noted that as of yet, of all the relevant

¹³ Different Slovak broadcasters actively participated in the campaign. Between 23 May and 4 June 2024, the RTVS broadcast the Slovak version of the video campaign 76-times on its programme services *Jednotka*, *Dvojka*, :24 and *Šport*. The television company MARKÍZA – SLOVAKIA, spol. s r.o. broadcast the campaign 98-times on its programme services *TV Markíza*, *Doma*, *Dajto* and *Krimi* between 24 May and 5 June 2024. The broadcaster C.E.N. s.r.o. included the spot in its broadcast on *TA3* 35-times in total between 25 May and 7 June 2024. The MAC TV s.r.o. broadcast the campaign 186-times on its channels *JOJ*, *PLUS*, *WAU*, *JOJ 24* and *JOJ SPORT* from 3 to 8 June 2024.

¹⁴ The [Platform Media Literacy+](#) platform brings together organisations and institutions, as well as experts active in the field of media literacy in Slovakia. It is coordinated by the Council for Media Services. Once a month, it publishes a [newsletter](#) summarising activities and inspirations in the field of media literacy.

¹⁵ [Newsletter of Platform Media Literacy+ preceding the European elections.](#)

¹⁶ Selected profiles of the organisations on the platforms: [Zmudri](#), [Fakescape](#), [Demagog.SK](#), [Infosecurity](#), [Rada mládeže Slovenska](#), [MEMO 98](#).

media literacy actors in Slovakia, the monitored platforms have only cooperated with *DigiQ*. This highlights the potential for expanding and enhancing cooperation with other experts and organizations in this field.

2.4 Monitoring of ad libraries of Meta, Google and ByteDance

In December 2023, the CMS published the results of the monitoring of the ad libraries of selected platforms (Meta Ad Library and Google Ads Transparency Center) in its monitoring report “Monitoring of platform functionalities in relation to the 2023 Elections to the National Council of the Slovak Republic”.¹⁷ This monitoring report contains a detailed description of the environment and functionalities of the monitored ad libraries in “Annex 1: Results of monitoring of ad libraries of Meta, Google and ByteDance”. It also identifies and describes potentially problematic aspects of these libraries in the context of the DSA and the Code in the chapter on “Problematic aspects of political advertising on platforms and inauthentic videos created using artificial intelligence tools”. Furthermore, the CMS also monitored these ad libraries in frame the monitoring exercise in relation to the Election of the President of the Slovak Republic in March and April 2024. The results of this monitoring exercise were published in the monitoring report “Results of monitoring of platform functionalities in relation to the 2024 Election of the President of the Slovak Republic”.¹⁸

The results of both monitoring exercises were in line with the situation ascertained during the monitoring of the 2024 European elections, including all previously identified problematic aspects.

The following problematic aspects of ad libraries were identified:

- Meta Ad Library lacked translations into Slovak,
- Google Ads Transparency Center lacked advertisers’ contact details, including only a message indicating that the “Identity of this advertiser has been verified” (see figure below). Clicking on this advertiser verification notice opened a separate page called “Election ads verification” which contained Google’s general rules for verifying sponsors of political advertising. Article 12 of the TTPA provides for the obligation of publishers of political advertising to ensure that the transparency notice includes the identity of the sponsor and, where applicable, of the entity ultimately controlling the sponsor, including their name, email address, and, where made public, their postal address, and, when the sponsor is not a natural person, the address where it has its place of establishment. This Article of the above-mentioned Regulation is foreseen to take effect in October 2025, and was therefore not yet applicable at the time of the elections. However, Article 27(e) of the Commission Guidelines advises providers of VLOPs and VLOSEs to prepare for the entry into application of the TTPA. Based on our findings, we consider the amount of information provided in Google Ads Transparency Center to be insufficient, as it does not contain all the relevant information about sponsors of the political advertisement.

¹⁷ CMS monitoring report: [Monitoring of platform functionalities in relation to the 2023 Elections to the National Council of the Slovak Republic](#).

¹⁸ CMS monitoring report: [Results of monitoring of platform functionalities in relation to the 2024 Election of the President of the Slovak Republic](#).

Kedykoľvek ▾ Zobrazené v oblasti: Slovensko ▾ Všetky platformy ▾

🔍 Všetky témy ▾ Hľadať inzerenta alebo web

Sloboda a Solidarita

Meno či názov: Sloboda a Solidarita

Sídlo: Slovensko

🔒 Totožnosť inzerenta bola overená

 Tento inzerent zobrazuje politické reklamy, ktoré obsahujú ďalšie informácie. Ak chcete tieto informácie zobrazíť, vyberte politickú reklamu z týchto výsledkov alebo zo [stránky s politickými reklamami](#) inzerenta. Zavrieť

Anywhere – Displayed in: Slovakia – All platforms
 All topics – Search for advertiser or web

Sloboda a solidarita
 Name/title: Sloboda a solidarita
 Place of establishment: Slovakia
 Identity of this advertiser has been verified

This advertiser presents political advertising containing additional information. To see this information, select political advertising in these results or the political advertising page of the advertiser. Close

The CMS concluded that the platforms formally maintain publicly available ad libraries which contain all published political advertisements on a given service, and these libraries enable users to search and filter these advertisements based on relevant attributes. However, these ad libraries exhibit functional deficiencies (absence of Slovak translations in Meta Ad Library and absence of advertiser contact information in Google Ads Transparency Center). **Based on these findings, the CMS concluded that the monitored platforms responded to the recommendations in Article 27(e) of the Guidelines regarding their established ad libraries only partially.**¹⁹ **Simultaneously, for Google Ads Transparency Center, the absence of advertiser contact information may also be perceived as non-compliance with the advertising transparency requirements under Articles 26 and 39 of the DSA.**

¹⁹ Article 27(e) of the [Guidelines](#) provides, inter alia, that providers of VLOPs and VLOSEs are advised that, when complying with the obligations laid down in Article 26 of Regulation (EU) 2022/2065 and in line with the forthcoming regulation on the transparency and targeting of political advertising, these are labelled in a clear, salient and unambiguous manner and in real time to allow users to understand that the content displayed contains political advertising. In addition, the labels applied should remain in place when shared by users on the same platform. The Commission also recommends that providers of VLOPs and VLOSEs harmonize their policies with the Regulation on Political Advertising in advance of its entry into application, which complements the legal obligations stemming from Articles 26 and 39 of Regulation (EU) 2022/2065, and in particular when providing users with information about the political advertisements they see, such as the sponsor identity and, where applicable, the entity ultimately controlling the sponsor; the period during which the political advertisement is intended to be published, delivered or disseminated; the aggregated amounts and the aggregated value of other benefits received by the providers of political advertising services; as well as meaningful information about the main parameters used to determine the recipient to whom the advertisement is presented.

2.5 Description of the political advertisements displayed on platforms and user interfaces

As a part of the monitoring of the presentation of political advertisements on different platforms, the CMS focused on covering as wide a range of user interfaces as possible. However, the monitoring exercise did not capture political advertisements on all platforms, user interfaces and media. The individual descriptions represent the presented political advertisement from the point of view of the common user, i.e. the manner in which the message indicating that the advertisement is a political advertisement is presented to the user.

As for the advertisements displayed in the user environment, it was concluded that the situation was identical to the situation ascertained by the monitoring exercise carried out prior to the Presidential election in spring 2024, i.e. the monitoring exercise did not identify any potential deficiencies. This is considered a progress compared to the situation identified by the monitoring exercise carried out in relation to the 2023 Parliamentary elections, which had detected absence of political advertising disclaimer for Meta and absence of labelling of political advertising for Google.²⁰

Furthermore, the CMS concluded that in the context of the advertisements examined, all monitored platforms formally respected the recommendations contained in the Guidelines²¹, paving the way for the implementation of the relevant provisions (namely Articles 11 and 12 regulating the attributes of labelling of political advertisements) **of the TTPA**, which will enter into force in October 2025.

2.5.1 Meta

Facebook smartphone interface - Feed

There is a statement under the name of a page or a profile, such as: "Sponsored – Paid for by *Demokrati*". In the upper right corner of the advertisement, there is an "i" icon or "Learn more about this Ad". Clicking on this icon opens a message about "Who pays for this advertisement" (contact details of the advertiser) and a link to learn more about the advertisement in Meta Ad Library (comprehensive information about the advertisement, date of activity, range of the amount spent on promoting the ad, targeting, number of impressions, i.e. the number of views and interactions with the content).

²⁰ [Monitoring of platform functionalities in relation to the 2023 Elections to the National Council of the Slovak Republic](#), Chapter 3.1 *Ad libraries*, p. 20.

²¹ Article 27(e) of the [Guidelines](#) provides that providers of VLOPs and VLOSEs are advised to maintain a publicly available, searchable repository of political ads, updated in as close as possible to real-time. This shall include, as a minimum, the total number of recipients of the service reached and, where applicable, the aggregate numbers broken down by Member State for the group or groups of recipients that the advertisement specifically targeted, as mandated by Article 39 of Regulation (EU) 2022/2065, and could also include, for example, the aggregated amounts and the aggregated value of other benefits received by the providers, the number of impressions and the geographical areas in which the ad was presented.


Demokrati 2023 
⋮ ✕
 Sponzorované · Platí to Demokrati · 

Nikdy sa nezmierime s násilím v spoločnosti... [Viac](#)




3
i

Jana Žitňanská
POKOJ
*neznamená byť ticho
 pri útokoch na nevinných*

neustupime.sk

neustupime.sk Viac informácií
Násiliu nikdy neustúpime

  22 4 komentáre

 Páči sa mi to
 Komentár
 Zdieľať

Demokrati 2023
 Sponsored – Paid for by Demokrati
 We will never accept violence in our society... More
Jana Žitňanská
Peace does not mean keeping quiet when the innocent are under attack
 neustupime.sk
We will never stop fighting against violence! More information
 like – comment – share

Facebook smartphone interface - Video

Under the name of the page or profile there is a statement e.g. "Paid for by *Progresívne Slovensko*" and an indication of "Sponsored" on the bottom. Clicking on the "i" icon displays the information about "Who pays for this advertisement" (contact details of the sponsor of the advertisement) and a link to find out more about the advertisement in Meta Ad Library.



Ľudovít Ódor and *Progresívne Slovensko*
Paid for by *Progresívne Slovensko*
Sponsored



About this ad
Ľudovít Ódor
Public personality
Details of political advertising
Why am I seeing this ad?
Manage ad topics

Facebook smartphone interface - Reels

No political advertising was detected.

Facebook PC interface - Feed

There is a statement under the name of a page or a profile, such as: "Sponsored - Paid for by *Progresívne Slovensko*" In the upper right corner of the advertisement, there is an "i" icon or "Learn more about this Ad". Clicking on the "i" icon displays the information about "Who pays for this advertisement" (contact details of the sponsor of the advertisement) and a link to find out more about the advertisement in Meta Ad Library.



Progressive Slovakia
Sponsored - Paid for by Progresívne Slovensko
Will Slovakia be European and democratic or represented in the EP by people dragging it eastwards and destroying the rule of law?
Sponsor: *Progresívne Slovensko* (company details)
Supplier: Meta Platforms Ireland Limited (company details)

[Facebook PC interface - Video](#)

No political advertising was detected.

[Facebook PC interface - Reels](#)

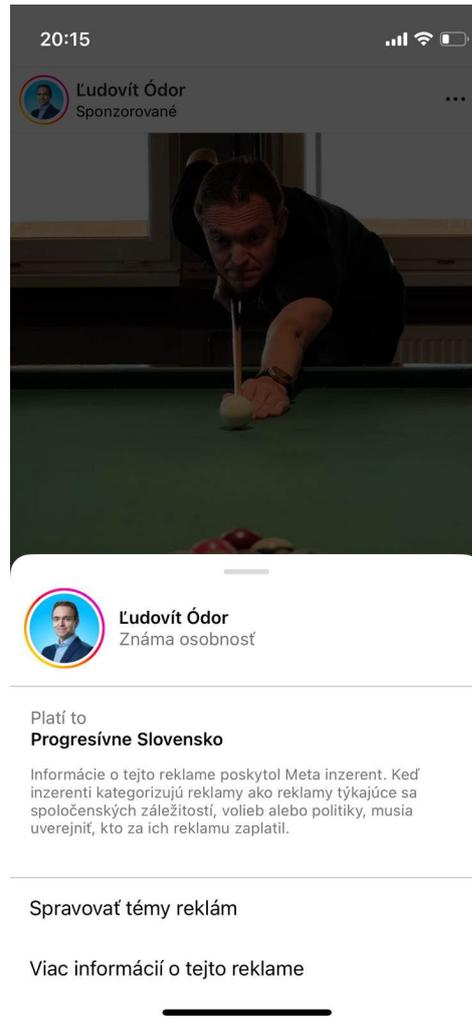
No political advertising was detected.

[Instagram smartphone interface - Feed](#)

There is a statement under the name of a page or a profile, such as "Sponsored". Under the advertisement and interaction data, there is another statement, e.g.: "Paid for by *Progresívne Slovensko*". Clicking on this notification displays information about the advertiser and the entity paying for the advertisement, with a link redirecting the user to further information about the advertisement in Meta Ad Library.



Ludovít Ódor
Sponsored
Paid for by **Progressívne Slovensko**



Ludovít Ódor
Public personality
Paid for by **Progressívne Slovensko**
This information was provided by the advertiser. When the advertiser classifies their advertisement as related to social issues, elections or politics, they are obliged to disclose who the ad was paid for by.

[Instagram smartphone interface - Stories](#)

No political advertising was detected.

[Instagram smartphone interface - Reels](#)

No political advertising was detected.

[Instagram PC interface - Feed](#)

No political advertising was detected.

[Instagram PC interface - Stories](#)

No political advertising was detected.

[Instagram PC interface - Reels](#)

No political advertising was detected.

2.5.2 Google

[Google Search PC interface](#)

No political advertising was detected.

[Google Search smartphone interface](#)

No political advertising was detected.

[YouTube smartphone interface - Video](#)

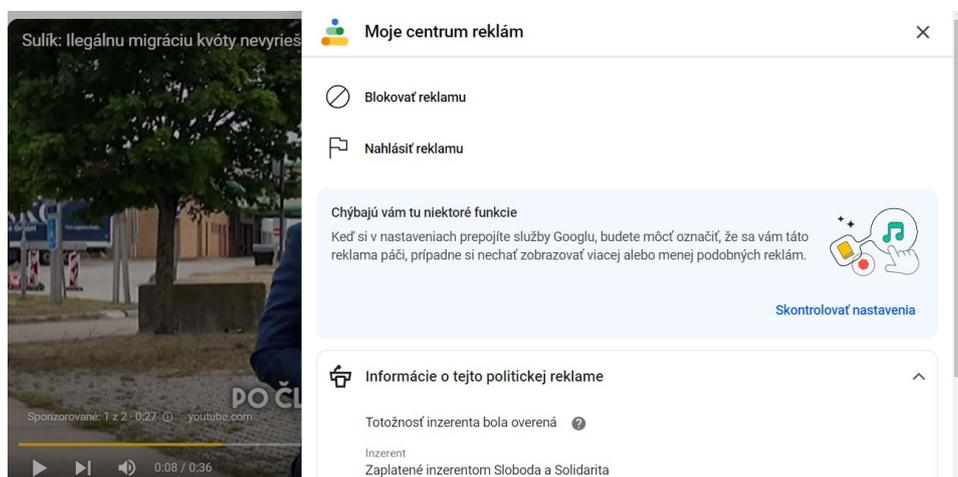
No political advertising was detected.

[YouTube smartphone interface - Shorts](#)

No political advertising was detected.

[YouTube PC interface - Video](#)

A video advertisement that plays before the requested video itself is played on YouTube. The bottom left corner of the video advertisement contains a message, e.g.: "Sponsored 1 of 2 00:27 (i) youtube.com". Clicking on the "i" icon opens a window with information about the advertiser and sponsor of the advertisement with a link that redirects the user to Google Ads Transparency Center containing the advertiser's advertisements.



<p>My Ad Centre Block ad Report ad Some features are missing By connecting to Google services in the settings you will be able to like this ad and/or manage presentation of more or fewer similar ads. Check settings Go to settings About this ad Identity of this advertiser has been verified Paid for by Sloboda a solidarita</p>

[YouTube PC interface - Shorts](#)

No political advertising was detected in the course of the monitoring exercise.

[YouTube TV interface - Video](#)

No political advertising was detected.

[YouTube TV interface - Shorts](#)

No political advertising was detected.

2.6 Regulation of the European Parliament and of the Council on the transparency and targeting of political advertising

At the time of the European elections (June 2024), only Articles 3 and 5(1) of the TTPA were effective.

Article 3 of the Regulation defines the key terms related to political advertising. These include definitions of political advertising, who is considered to be the provider of these services, etc.

Article 5(1) concerns non-discriminatory provision of political advertising services in the Union. Under this Article, providers of political advertising services shall not make the provision of their services subject to discriminatory restrictions solely based on the place of residence or establishment of the sponsor. Providers of political advertising services shall not restrict the provision of their services to a European political party, or a political group in the European Parliament, solely on the basis of its place of establishment. If providers of political advertising services introduced such restrictions, it would disturb the level playing field between European political parties in the European elections.

At the time of the elections, the provisions defining the rules for the labelling of political advertising (in particular Articles 11 and 12) were not yet effective (and are to enter into force and become applicable and enforceable in October 2025). This Regulation requires that the information published in the transparency notice is easily accessible, machine-readable, where technically feasible, and user-friendly (meeting the needs of persons with disabilities). In order to take into account the latest technological and market developments, relevant scientific research and best practices, and to ensure that transparency notices are adapted to the medium used, implementing powers have been conferred on the Commission under the Regulation to adopt implementing acts to establish the format of the notices and further technical specifications (e.g. the transparency notice should also be in a machine-readable format).

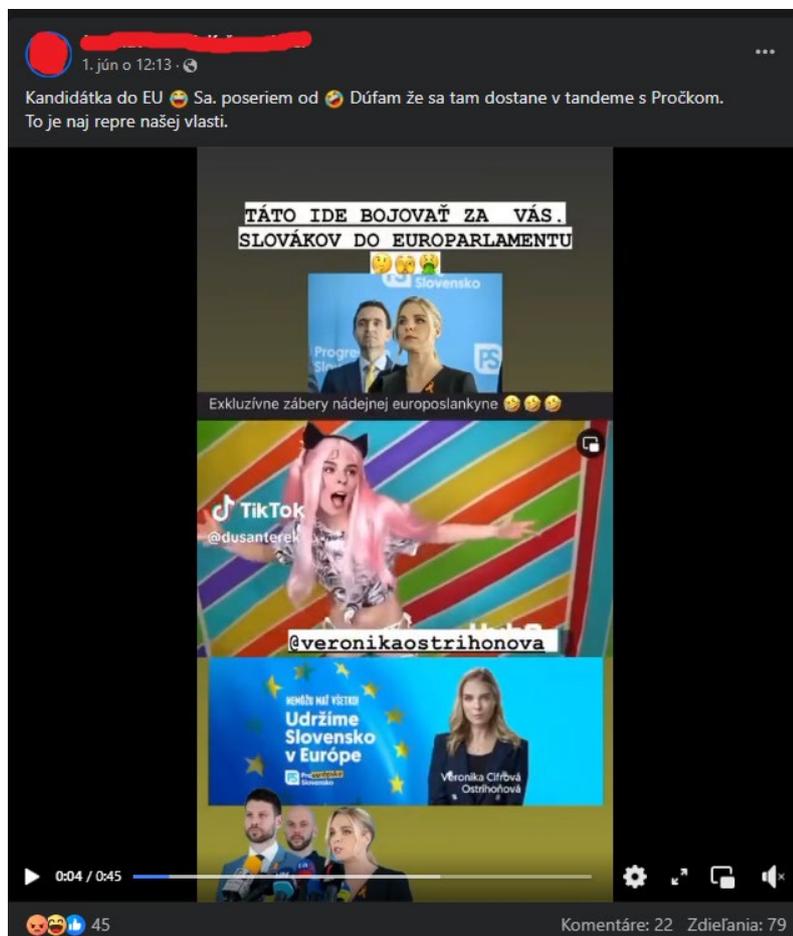
The monitoring exercise carried out by the CMS did not detect any potential violations of the effective provisions by the monitored platforms.

2.7 Deepfake videos created using AI technology

In frame of the monitoring of the election campaign on the social network platforms, the CMS did not receive any requests for investigation of complaints from the public or another government institution. However, its own monitoring capacities detected occurrences of content that potentially violated the respective terms of service, and actively communicated these cases to the platforms. In accordance with the provisions of Article 110(3)(g) of the AMS²², the Office of CMS, on the basis of these facts, notified the relevant platforms of the presence of this content on their services, requesting an assessment of this content in terms of potential violation of their terms of service.

Description of detected content

The CMS's own monitoring capacities detected deepfake videos made using AI technology. These videos reportedly depicted Veronika Cifrová Ostrihoňová, an MEP candidate of *PS - Progresívne Slovensko*, dancing half-naked to music while making vulgar and lascivious gestures.



What an MEP candidate! ROFL! I hope she'll get there together with Pročko. The best representatives of our country!

²² [Article 110\(3\)\(g\) of the AMS](#): "The CMS is [...] empowered to cooperate with online content-sharing platforms to ensure efficient, proportionate and non-discriminatory application of the rules for the provision of their services."

The CMS's monitoring exercise detected this content three times in total:

- on 17 May 2024 on Facebook (operated by Meta);
- on 3 June 2024 on TikTok (operated by ByteDance);
- on 4 June 2024 on TikTok (operated by ByteDance).

In this context, the CMS concluded that **there is a rule set by Meta for Facebook and Instagram** that relates to a broader category of disinformation and manipulated media.²³ Specifically, this rule provides that *"media can be edited in a variety of ways. In many cases, these changes are benign, such as content being cropped or shortened for artistic reasons or music being added. In other cases, the manipulation is not apparent and could mislead, particularly in the case of video content. We remove this content because it can quickly go viral, and experts advise that false opinions regarding manipulated media often cannot be corrected by further discussion. We remove videos under this policy if specific criteria are met:*

- *the video has been edited or synthesized beyond editing for clarity or quality in a manner that is not obvious to an ordinary person and that would be likely to mislead an ordinary person into believing that the subject in the video said words that he did not say; and*
- *the video is the product of artificial intelligence or machine learning, including deep learning techniques (e.g., a technical deepfake), that merges, combines, replaces, and/or superimposes content onto a video, creating a video that appears authentic."²⁴*

ByteDance's TikTok also clearly defines the media whose distribution is prohibited on the platform: *synthetic media is content created or modified by AI technology. It includes highly realistic digitally-created (fake) content of real people, such as a video of a real person speaking but their words have been modified or changed."* [...] *It is not allowed to share synthetic media that contains the likeness (visual or audio) of a real person, including [...] an adult public figure when used for political or commercial endorsements, or if it violates any other policy. Material that has been edited, spliced, or combined (such as video and audio) in a way that may mislead a person about real-world events is equally not allowed.*

In all three cases, the CMS reported the video in question, together with the context of its publication, to the companies operating the respective services using designated communication channels. In all three cases the content was removed within a few hours on the same day.

Regarding this result of the CMS's monitoring exercise aimed at detecting content potentially violating the terms of the monitored services in the context of the 2024 European elections, we concluded that **the occurrence of content detected by the CMS's monitoring exercise did not reach the same level and intensity as it was the case in the previous, similar thematic monitoring exercise during the Elections to the National Council of the Slovak Republic in September 2023²⁵ and the 2024 Presidential election²⁶.** We note in this context that the overall intensity and character of the campaign leading up to the European elections was affected by the attempted assassination of the Prime Minister of the Slovak Republic, Robert Fico, on 14 May 2024, i. e. when the election campaign was gaining in intensity. In response to this event, most political parties decreased the intensity of their campaign activities.

²³ [Facebook Transparency Center, Section IV. Manipulated media.](#)

²⁴ [TikTok Community Guidelines: Synthetic and Manipulated Media.](#)

²⁵ [Monitoring of platform functionalities in relation to the 2023 Elections to the National Council of the Slovak Republic.](#)

²⁶ [Results of monitoring of platform functionalities in relation to the 2024 Election of the President of the Slovak Republic.](#)

CONCLUSION

By virtue of its statutory powers conferred on it by the AMS, the CMS closely monitored Facebook, TikTok and YouTube throughout the campaign period leading up to the 2024 European elections. Focusing on potential breaches of the AMS, fulfilling the commitments under the Code and compliance with the obligations under the DSA, the CMS led an active dialogue with representatives of the monitored services. It addressed, among others, efforts to increase the awareness of users of the respective services of electoral processes, as well as the transparency of political advertisements.

The CMS did not receive any complaints from the public regarding the elections and social media. The monitoring exercise also focused on transparency of political advertisements, mainly in terms of availability and traceability of information about the sponsor of the political advertisement and the functionalities of ad libraries. The deficiencies identified in the ad libraries included the absence of translations into Slovak language and missing advertiser details.

Prior to the European elections, the monitored platforms carried out multiple EU-wide activities to prevent the spread of disinformation, to increase EU citizens' media literacy and to raise their awareness of the electoral processes. Google and ByteDance provided users with information about the elections via information panels and ran awareness-raising campaigns on their platforms, reaching a significant number of impressions. Google also launched a number of initiatives to combat disinformation and trainings for journalists. TikTok shared educational videos made in collaboration with *DigiQ*. In contrast, Meta did not provide any specific data on its activities. Its efforts in the monitored areas were therefore assessed only on the basis of information obtained by the CMS during the monitoring. Due to this, only activities aimed at raising awareness of users of electoral processes and content moderation were assessed, with Meta's actions evaluated, in comparison to other platforms, as mostly sufficient to mostly insufficient. Overall, Google and ByteDance actively engaged in informing users about the electoral process and in promoting media literacy, while Meta lagged behind. However, there is scope for further improvement for all platforms, especially in the area of cooperation with local actors and targeting and evaluation of the impact of their activities.

Taking into account the findings regarding the transparency of political advertisements, the CMS considers that the monitored platforms failed to consistently implement and comply with all the requirements for advertising transparency under Articles 26 and 39 of the DSA. Potential violations of the DSA include the insufficient functionality of the advertisement repositories of individual platforms, which significantly hinders users' effective access to information.

In the context of the obligations under the TTPA, the CMS concluded that the platforms implemented all the provisions which were effective at the time, namely Articles 3 and 5(1), and partially respected the recommendations of the Guidelines.

The conclusions presented in this report provide an overview of the readiness of platforms for the 2024 European elections and can serve as an inspiration for other EU Member States. The authors recommend using the results of this report to assess the effectiveness of the Code and to provide feedback on the implementation and application of the provisions of the DSA and TTPA at EU level.

PART II – A comparative analysis of selected results of monitoring activities related to elections held in the Slovak Republic in 2023 – 2024

FOREWORD

Between September 2023 and June 2024, over a ten-month period, three elections were held in the Slovak Republic:

- the snap Elections to the National Council of the Slovak Republic on 30 September 2023 (“Parliamentary elections”),
- the first and the second round of the Election of the President of the Slovak Republic (“Presidential election”) on 23 March 2024 and 6 April 2024,
- the Elections to the European Parliament on 8 June 2024 (“European elections”).

In all three cases, the Council for Media Services (“CMS”) actively monitored the functionalities of Facebook, Instagram, TikTok and YouTube, and published the results of these monitoring exercises in its monitoring reports.²⁷ Formally, all monitoring exercises consisted of data collection (monitoring of the platforms’ functionalities at the peak of the election campaign) and subsequent evaluation of the collected data in combination with selected datasets provided by the platforms (structured questionnaires sent to the platforms). On this basis, the CMS’s monitoring exercise produced a dataset which maps the development of the functionalities of the monitored platforms in the designated period and illustrates the response of these platforms to electoral processes and the conduct of electoral campaigns on their respective services. The aim of this comparative analysis is to compare the data obtained in this manner and the identified phenomena.

The above-mentioned activities of the CMS resulted in the following findings:

- all three monitored platforms mostly met the requirement to increase user awareness of electoral processes through reliable information sources, TikTok being the overall best-performing platform. Regarding the transparency of political advertising, Google mostly failed to meet the requirements and Meta mostly succeeded in meeting them, albeit with minor reservations. Meta, in particular, lags behind in the implementation of preventive and awareness-raising activities targeting the public, while ByteDance’s activities were evaluated positively for all three elections. A gradual improvement was identified for Google;
- regarding ad libraries and advertisements displayed in the user interfaces, the recommendation of Article 27(e) of the European Commission Guidelines, advising providers of VLOPs and VLOSEs to prepare for the entry into application of the Regulation (EU) 2024/900 on the transparency and targeting of political advertising, was respected by the monitored platforms only partially;
- a persisting inconsistency of platforms in evaluation of potentially problematic content as defined by their own terms of service.

1 BACKGROUND

The key baselines of the CMS’s monitoring of the online environment and the election campaign conducted therein in the context of the 2023 Parliamentary elections, the 2024 Presidential

²⁷ The results of the monitoring of the [Parliamentary elections](#); the results of the monitoring of the [Presidential election](#); for the results of the monitoring of the European elections see [Part I](#) of this monitoring report.

election and the 2024 European elections in the Slovak Republic are described in detail in the respective monitoring reports.²⁸ All three cases fall in the merit of the CMS which, under Article 152 of the Act on Media Services (“AMS”), is entrusted with the responsibility and legal competence to prevent the dissemination of illegal content²⁹ on content-sharing online platforms (“platforms”). Also, under Article 110(3)(q) of the AMS, it is empowered to cooperate with online platforms to ensure efficient, proportionate and non-discriminatory application of the rules for the provision of their services. Additionally, the CMS acts as a contact point for all communication between the government authorities and operators of the most widely-used platforms in Slovakia (Facebook, Instagram, YouTube, TikTok).³⁰ In practice, this means that government authorities and institutions, which also carry out monitoring of social network content based on their designated competences, report potentially problematic content³¹ to the CMS, which subsequently communicates this content/these systemic elements to the respective platform within its remit.

In the context of the three elections held in the Slovak Republic from September 2023 to June 2024, the CMS actively monitored and analysed the functionalities of the platforms. The main objectives of the monitoring exercises can be categorised based on their focus as follows:

- examination of the implementation of the platforms’ obligations under the Code of Practice on Disinformation (“Code”), as well as the new obligations imposed on very large platforms (“VLOPs”) and very large online search engines (“VLOSEs”) under the Digital Services Act (“DSA”) and in the context of the applicable provisions 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 (“TTPA”);
- monitoring of the steps taken by the platforms to raise citizens’ awareness of the electoral processes. The CMS focused on initiatives aimed at providing the public with relevant and reliable information about the conduct of the elections or to warn them against the dissemination of false or manipulative information about electoral processes;
- monitoring of ad libraries of the platforms and of the advertisements presented in the platforms’ user interfaces in order to identify whether online platforms actively updated their ad libraries to include comprehensive information about political and issue advertisements, thereby ensuring transparency and accessibility of information to the public, in line with the applicable legislation (DSA) and the commitments under the Code;
- detection of potential violations of the AMS and the dissemination of potentially illegal content on content-sharing platforms, and the possible dissemination of potentially problematic content.

²⁸ Chapter 2 on the baselines for the monitoring of the [Parliamentary elections](#); Chapter 2 on the baselines in the monitoring of the [Presidential election](#); for the baselines for the monitoring of the [European elections](#), see Chapter 1 Part I of this monitoring report.

²⁹ [Article 151\(2\) of the AMS](#) defines illegal content as content that exhibits the characteristics of child pornography or extremist material; incites an act exhibiting the characteristics of any of the terrorist offences; or exhibits the characteristics of the criminal offence of denial and condoning of the Holocaust, crimes of political regimes and crimes against humanity, criminal offence of insult of the State, race and belief or criminal offence of incitement to national, racial or ethnic hatred. (the definitions of the respective offences derive from Act 300/2005 Coll., i.e. the Criminal Code).

³⁰ The level of popularity of the platforms in Slovakia was confirmed by the transparency reports prepared under the DSA, published at the end of October 2023.

³¹ Potentially problematic content refers to content which is evaluated by the CMS as potentially violating terms and conditions (e.g. Community Standards, Terms of Use, etc.) of the platforms and which simultaneously does not exhibit the characteristics of illegal content as defined by the AMS. For such content, the CMS has no authority to initiate administrative proceedings or use other administrative tools to enforce the removal or restriction of the content.

2 COMPARATIVE ANALYSIS OF MONITORING RESULTS

The following analysis provides comparisons of the findings produced by the CMS's monitoring exercises carried out in the context of the three elections (2023 Parliamentary elections, 2024 Presidential election and 2024 European elections) held in the Slovak Republic from September 2023 to June 2024. Apart from the description of the identified phenomena, this analysis aims to compare their development in the context of the changes made by the platforms in the given areas during the monitored periods, as well as to point out the potential risks that inherently arise from the complexity and constant dynamic development in the area of sponsored political content published on VLOPs and VLOSEs.

2.1 Application of the AMS and evaluation of communication with platforms

During the three monitoring periods, the CMS focused in particular on effectiveness of implementation of the relevant provisions of the AMS, which confers various competences on the CMS, both in terms of communication with platforms and preventing the dissemination of illegal content. Based on these competences and other factual elements, a meeting with the representatives of the monitored platforms was held in September 2024 at the premises of the Representation of the European Commission in Slovakia. This meeting played a key role in establishing contact between the regulator and online platforms prior to the Parliamentary elections. Establishing contact was important especially because these were the first elections in the EU during which the DSA obligations for very large platforms were already applicable. The CMS succeeded in maintaining regular contact with the platforms during all three elections, which contributed significantly to improved preparation and more effective information exchange during the electoral processes.

The CMS was also active on the international stage, communicating with signatories of the Code, including all monitored platforms as well as associations of fact-checkers, researchers and civil society organisations. These interactions provided valuable information on the current narratives and platforms' responses to emerging issues. The Code and its community proved to be very beneficial in the context of the dissemination of deepfake videos prior to the Parliamentary elections and after the attempted assassination of Prime Minister R. Fico in May 2024. The CMS's international relations thus bring added value to the Slovak information environment by facilitating further research and oversight of the accountability of platforms for addressing problematic content.

Thanks to our long-term efforts aimed at constructive communication with the platforms, they willingly respond to questionnaires and carry out additional activities in Slovakia. Prior to the European elections, these efforts were reinforced by the Commission Guidelines calling on platforms to establish contact with the relevant authorities in the Member States. The CMS's long-term activities facilitated a more effective response to incidents and rapid reporting of disseminated problematic content to platform providers. For more details on quality of the evaluations and the responsiveness of the platforms see Chapter 2.4 *Specific cases of problematic content*³².

Long-term activities and networking at national and international level have significantly contributed to a more effective implementation of the AMS, the DSA and the Code. This cooperation is crucial and should be further reinforced and developed, particularly in the context of the DSA, focusing on monitoring systemic risks on platforms, including in cross-border contexts. One of the findings was the confirmation of the importance of communication between

³² [2.4 Specific cases of problematic content.](#)

platforms and local authorities, and sufficient time and attention being paid to the local context, especially in critical situations such as elections. The coordination and cooperation between platforms and national regulatory bodies helps ensure the integrity of electoral processes and to address the problems related to the emerging disinformation and problematic content in an effective manner.

2.1.1 Platforms' activities aimed at raising citizens' awareness of electoral processes

The CMS's monitoring of the elections focused on the activities of platforms aimed at raising citizens' awareness of electoral processes. During the Parliamentary elections, the Presidential election and European elections, the CMS, acting within its competences and based on its experience, prepared a designated monitoring exercise for the platforms of Meta (Facebook, Instagram), Google (YouTube) and ByteDance (TikTok), aiming to find out how these platforms fulfil the obligations under the European legislation and the Code.

The three rounds of monitoring focused on the activities implemented by the platforms to increase user awareness, using reliable sources, for example by increasing the visibility of information about the elections published by the Ministry of the Interior. As a part of these activities, the CMS monitored whether the platforms cooperated with local organisations to increase citizens' media literacy, and thus contributed to a better understanding of the electoral process and mitigation of the risks associated with the spread of disinformation.

Another important aspect was the compliance with the electoral silence period, with the CMS monitoring the steps that platforms took to prevent the spread of paid political advertising during the electoral silence period. The CMS also focused its attention on the platforms' practices for ensuring transparency of political advertising, especially clear labelling and verification of information about the sponsors of political advertisements (see the next subchapter for more information).

If needed, the CMS asked platforms to respond quickly and transparently to the competent authorities when evaluating complaints, particularly those relating to the dissemination of disinformation or content potentially undermining the integrity of elections. This monitoring approach was complemented by questionnaires which gave the service providers an opportunity to provide relevant facts, and thus help the CMS gain a comprehensive overview of the effectiveness of their measures and activities in Slovakia in the context of all three elections.

The following section summarises the main findings for the platforms monitored during the Parliamentary elections, the Presidential election and European elections in 2023 and 2024 and concludes with several practical recommendations for the future.

TikTok (operated by ByteDance)

For the Parliamentary elections, TikTok fulfilled most of the requirements for increasing users' awareness of the electoral processes. The platform successfully developed information panels and the Election Hub in the Slovak language, with content that was easily accessible and clear. Also, TikTok collaborated with *DigiQ*, a local organisation. However, there were shortcomings in content moderation and tackling disinformation. While the platform removed or restricted all escalated content, it failed to provide sufficiently detailed data on the evaluation of disinformation narratives and increasing fact-checkers' capacities during the Parliamentary elections. As far as political advertising is concerned, TikTok did not allow any paid political advertising on the Slovak territory during this period.

During the Presidential elections, TikTok ensured a sufficient level of citizens' awareness using information panels and the Election Hub, which reached more than 22,000 visits. Users were redirected to the Election Hub using election-related keywords. The information was clear and accessible. TikTok also promoted educational videos on media literacy developed by the Slovak

partner organisation *DigiQ* via the TikTok Election Hub. As far as political advertising is concerned, TikTok did not allow any paid political advertising on the Slovak territory during this period. Regarding content moderation, the platform removed or intervened against a large number of posts. The response time for election-related content was more than 24 hours, indicating a need for improvement in responsiveness. Although TikTok did contract fact-checkers, their performance could have been better in terms of number of verified videos and their effectiveness.

In the European elections, TikTok ensured sufficient coverage of information panels and features, including the creation of the Election Hub that reached more than 55,900 visits. The information was prepared in cooperation with the European Commission and other relevant organisations, ensuring its quality and accuracy. As far as political advertising is concerned, TikTok did not allow any paid political advertising on the Slovak territory during this period. Prior to the European elections, TikTok developed educational videos for Slovak users in cooperation with *DigiQ*. These videos were aimed at helping users distinguish disinformation and verify facts. They were available in the Election Hub launched by TikTok at the end of March 2024.

TIKTOK	PARLIAMENTARY ELECTIONS	PRESIDENTIAL ELECTION	EUROPEAN ELECTIONS
INFORMATION PANELS AND FEATURES	Sufficient	Sufficient	Sufficient
POLITICAL ADVERTISING AND ELECTORAL SILENCE PERIOD	N/A	N/A	N/A
ACTIVITIES TO PREVENT THE SPREAD OF DISINFORMATION AND TO PROMOTE MEDIA LITERACY	Mostly sufficient	Sufficient	Sufficient
CONTENT MODERATION AND COOPERATION WITH INDEPENDENT FACT-CHECKERS	Mostly insufficient	Mostly sufficient	Mostly sufficient
OTHER ACTIVITIES	N/A	N/A	Mostly insufficient

[Facebook and Instagram \(operated by Meta\)](#)

For the Parliamentary elections, Meta achieved mixed results. Increasing users’ awareness of the electoral processes was partially achieved; information panels were available on Facebook before and during the elections but not on Instagram, which is why their reach was limited. The requirement for implementation of preventive and awareness-raising activities was mostly not met; prior to the Parliamentary elections, Meta did prepare a “Facts in focus” campaign focused on fact-checking in cooperation with local artists. However, it did not target only Slovakia, but also Lithuania and Bulgaria. Its impact was significantly reduced by the fact that it was in English. The campaign carried out by Meta prior to the Presidential election in cooperation with *DigiQ* was evaluated more positively; this campaign was in Slovak language and, according to the available data, reached a significant part of the Slovak population. However, its real impact remains unknown. The requirement for efficient evaluation of alerts on the spread of disinformation narratives was mostly met, but the data provided was incomplete, which did not allow for a comprehensive evaluation.

For the Presidential election, Meta achieved mixed results in different areas. Information panels were available on Facebook on the election day, but were not detected on Instagram, which

reduced their effect. There was no media literacy campaign for the public prior to the Presidential election, although the company conducted trainings for NGOs and fact-checkers. Moderation of content was mostly sufficient, with Meta demonstrating better cooperation with fact-checkers, but the lack of tangible data and its inconsistency with data available to the CMS did not allow for a comprehensive evaluation. We welcome additional activities, such as trainings for partners and independent fact-checkers, as a positive step, but gaps in scope and effectiveness remain.

META	PARLIAMENTARY ELECTIONS	PRESIDENTIAL ELECTION	EUROPEAN ELECTIONS
INFORMATION PANELS AND FEATURES	Mostly sufficient	Mostly sufficient	Mostly insufficient
POLITICAL ADVERTISING AND ELECTORAL SILENCE PERIOD	Mostly sufficient	Mostly insufficient	N/A
ACTIVITIES TO PREVENT THE SPREAD OF DISINFORMATION AND TO PROMOTE MEDIA LITERACY	Mostly insufficient	Mostly insufficient	N/A
CONTENT MODERATION AND COOPERATION WITH INDEPENDENT FACT-CHECKERS	Mostly sufficient	Mostly sufficient	Mostly sufficient
OTHER ACTIVITIES	N/A	Sufficient	N/A

During the monitoring of the European elections, information panels were observed on Facebook and Instagram. However, Meta failed to reply to the CMS’s questionnaire. Detailed duration of their presentation and interactions thus remained unknown. Comparing Meta’s activities to other platforms resulted in a mostly insufficient score. Meta’s efforts in the area of content moderation and collaboration with fact-checkers were evaluated as mostly satisfactory. Although only one case of problematic content was reported, its response was more or less as rapid as TikTok’s. On the other hand, the CMS did not observe an increase in the capacities of independent fact-checkers. No other potentially relevant activities were identified.

Meta’s activities related to the elections were evaluated as mostly insufficient in the long term, with no improvement observed, especially regarding activities to promote media literacy. Meta demonstrated a certain level of effort, but the observed shortcomings in raising user awareness and content moderation highlight the need for significant improvement. The CMS’s ability to accurately evaluate the effectiveness of steps taken by Meta during the elections was also affected by missing data and insufficient questionnaire replies.

[YouTube \(operated by Google\)](#)

For the Parliamentary elections, Google sought to raise users’ awareness of the electoral process by sharing reliable sources of information. It provided relevant information on YouTube and Google Search, including links to the website of the Ministry of the Interior and information on voting by mail and election results, thus ensuring easy access to this information by its users. Nevertheless, no data on interactions with this content was provided, making it impossible to fully evaluate the effectiveness of these measures. Although we welcome long-term projects such as *Hrdinovia Internetu* or activities aimed at improving media literacy skills of elderly in Slovakia, activities in the area of media literacy prior to the Parliamentary elections were evaluated as mostly insufficient, mainly because Google did not develop designated campaigns immediately before the elections. Furthermore, the CMS considered that tools such as “About

this result” and “Content Advisory Notice” did not generate the desired added value for its users. The requirements for effective assessment of alerts on the spread of disinformation narratives and moderation of content were evaluated as mostly met. Google provided data on content moderation; however, this data was not country-specific. The platform responded quickly to the escalated content, but did not increase its fact-checking capacity.

For the Presidential election, Google provided information on YouTube and Google Search, including links to the website of the Ministry of the Interior and the election results. Information panels were available before both the first and second rounds, including a separate notification after the second round with a link to the results of the Statistical Office. Media literacy activities prior to the Presidential election were evaluated as mostly insufficient. However, an improvement was observed thanks to the introduction of new information literacy tools such as “About this image” and “About this content”. The evaluation was affected by the absence of a designated campaign prior to the election. We welcomed the continuation of the above-mentioned long-term activities. No specific data was provided on content moderation and collaboration with fact-checkers, which limited our evaluation options. As for other activities, Google supported research on disinformation narratives in Slovakia and organised meetings and conferences on countering disinformation. It also continued to provide training activities for journalists and supported major events on election integrity.

Google provided extensive information on the European elections which was displayed on Google.sk and YouTube during crucial days of the election period. Information panels and a dedicated Google Doodle ensured high visibility and easy accessibility of this information, and the number of views was significant. Its activities to counter spread of disinformation and to promote media literacy were evaluated as sufficient. Google and its partners created a special initiative to tackle disinformation in the period leading up to the elections, which was launched in mid-May and ran for five weeks, in all EU languages including Slovak. Google did not provide specific information on content moderation during the examined period. Google also participated in a number of activities aimed at combating disinformation, including supporting research, training activities for journalists and organising relevant events on election integrity.

GOOGLE	PARLIAMENTARY ELECTIONS	PRESIDENTIAL ELECTIONS	EUROPEAN ELECTIONS
INFORMATION PANELS AND FEATURES	Mostly sufficient	Mostly sufficient	Sufficient
POLITICAL ADVERTISING AND ELECTORAL SILENCE PERIOD	Mostly insufficient	N/A	Mostly insufficient
ACTIVITIES TO PREVENT THE SPREAD OF DISINFORMATION AND TO PROMOTE MEDIA LITERACY	Mostly insufficient	Sufficient	Sufficient
CONTENT MODERATION AND COOPERATION WITH INDEPENDENT FACT-CHECKERS	Mostly sufficient	Mostly sufficient	Mostly sufficient
OTHER ACTIVITES	N/A	Sufficient	Sufficient

Google’s activities aimed at promoting media literacy, including those aimed at countering the spread of disinformation, have shown a gradual improvement. Google took several steps to raise awareness of the elections through its platforms such as YouTube and Google Search, including by providing information and tools promoting media literacy. Although Google implemented

certain preventive measures against disinformation, the requirement for an effective content moderation was fulfilled only partially (especially due to the lack of cooperation with fact-checkers). The media literacy campaign run prior to the Presidential election was insufficient. Overall, Google succeeded in raising users' awareness of the electoral process, but there is scope for improvement in the areas of media literacy and content moderation.

2.1.2 Recommendations

Platforms should ensure that **information about elections**, including the voting process, rules and important dates, is **accessible and consistent across all their services** and platforms. During the election monitoring, the CMS found, for example, that the information provided to Instagram users was significantly more limited than for other monitored platforms.

Online platforms should promote **media literacy** primarily through long-term activities adapted to the local context and language. It is crucial to create sustainable educational content that is regularly updated to reflect current challenges, in collaboration with local experts and organisations. During elections and other major social events, platforms should launch specific campaigns aimed at identifying disinformation, linked to relevant sources and reinforced by adequate interactive tools. In addition, they should introduce mechanisms to regularly measure and evaluate the impact of these activities on users.

Platforms should **enhance their cooperation with independent fact-checkers**. This includes increasing their fact-checking capacities and integrating verified information into their systems. This collaboration should be regular and systematic, with platforms ensuring that validated facts are easily accessible to users and their impact is regularly measured and evaluated.

All three companies should improve their approach to content moderation, particularly during election periods. In frame of the monitoring exercise, the CMS repeatedly detected dissemination of problematic content affecting the electoral process and violating the platforms' rules of service. See the following subchapters for a comprehensive summary of the identified problematic content. Overall, platforms are encouraged to apply a consistent moderation approach when dealing with identical content.

2.2 Implementation of obligations under the applicable provisions of the DSA and TTPA

With the DSA now in effect, the monitored platforms must ensure that advertisements are presented to their service recipients in a clear, concise and unambiguous manner. According to Article 26 of the DSA, platforms must ensure that each individual recipient of the service is able to identify in real time, for example, the natural/legal person on whose behalf the advertisement is presented, or details about the main parameters used to target the recipient of the service. In the context of the additional obligations for very large online platforms (applicable to all monitored platforms), the providers of these services are obliged to make available to the recipients of the service an ad library, the main purpose of which is to facilitate retrospective browsing of active advertisements and thus increase the transparency of the online environment. Considering the conclusions of the report of the European Board for Digital Services on the European elections³³, we concluded that the monitored platforms have largely complied with the obligations on online advertising transparency under the DSA. However, the CMS's monitoring exercise also identified a number of specific aspects of ad libraries and individual advertisements displayed in the user interface that may potentially be perceived as

³³ [Report](#) on the 2024 European Elections and [press release](#) of the European Board for Digital Services.

problematic in the future in the context of the fully applicable obligations under the DSA and TTPA. These potentially problematic aspects are addressed in the following chapters, covering the results of monitoring of ad libraries and individual advertisements displayed in the user interface.

2.3 Ad libraries and advertisements in user interfaces

Detailed results of the monitoring of ad libraries and individual advertisements displayed in user interfaces were published in the respective monitoring reports.³⁴

For the TikTok Ads Library, the CMS concluded that ByteDance's advertisement repository enables the user to browse all sponsored content available on TikTok user interface through a multi-criteria query-based search. The repository can be filtered and searched by date, region/country (with Slovakia as default), type of advertisement and advertiser's name or keywords. However, according to the TikTok's terms of service, advertisers are not allowed to publish political advertising, which is why TikTok Ads Library was excluded from the following comparison.

2.3.1 Ad libraries

Parliamentary elections

When monitoring the Parliamentary elections in terms of ad libraries, the CMS concluded that *Meta Ad Library*³⁵ contained a catalogue of all sponsored content published on Meta's services (Facebook, Instagram, Messenger, Audience network). The library also allows for browsing advertisements based on various attributes (country, keywords or advertiser, ad category), enabling the user to select political advertisements under the category "Social Issues, Elections or Politics". The advertisements along with basic information about the advertisements are available in the Slovak language; **details about the characteristics and attributes of the advertisements** (metrics used to determine audience size, number of impressions, ad targeting, etc.) are available via the links to "Learn more". Clicking on these links will display the respective pages from *Meta Transparency Center* and *Meta Business Help Center*. However, these are **not available in Slovak, or in Slovak and/or English**; general information about advertisements on Meta's services is displayed in a combination of English and Slovak.

Regarding ad libraries, the CMS's monitoring exercise for the Parliamentary elections also concluded that the *Google Ads Transparency Center*³⁶ provides a comprehensive catalogue of all sponsored content/all advertisements published on Google's online services. This catalogue can be filtered and searched by date, region/country (default setting – Slovakia), format (video, image, text), type (all advertising, political advertising) and by advertiser (name of the political party for political advertisements). **After selecting the advertiser (the sponsor of the political advertisement), the user is informed that the identity of this advertiser has been verified. However, there were no contact details of the advertiser/sponsor of the advertisement.**

³⁴ Monitoring of the [Parliamentary elections](#) – Chapter 3.1 *Ad Libraries* and *Annex 1*; Monitoring of the [Presidential election](#) – Chapter 3.3 *Monitoring of ad libraries of Meta, Google and ByteDance* and Chapter 3.4 *Description of the political advertisements displayed on platforms and user interfaces*; Monitoring of the [European elections](#) – Part I of this monitoring report, Chapter 2.4 *Monitoring of ad libraries of Meta, Google and ByteDance* and Chapter 2.5 *Description of the political advertisements displayed on platforms and user interfaces*.

³⁵ [Meta Ad Library](#).

³⁶ [Ads Transparency Center](#).

Presidential election

Based on the monitoring of the functionalities of the ad libraries of selected platforms during the election campaign prior to the Presidential election, the CMS concluded that the **environment and functionalities of the monitored ad libraries of Meta and Google were identical to the situation ascertained during the monitoring of the 2023 Parliamentary elections, including all previously identified problematic aspects.**

The following problematic aspects of ad libraries were identified:

- Meta Ad Library lacked translations into Slovak,
- Google Transparency Center lacked advertisers' contact details.

European elections

Based on the monitoring of the functionalities of the ad libraries of selected platforms during the election campaign preceding the European elections, the CMS concluded that the **environment and functionalities of the monitored ad libraries of Meta and Google were identical to the situation ascertained during the monitoring of the 2023 Parliamentary elections and the 2024 Presidential election, including all previously identified problematic aspects.**

The following problematic aspects of ad libraries were identified:

- Meta Ad Library lacked translations into Slovak,
- Google Transparency Center lacked advertisers' contact details.

DETECTED POTENTIAL GAPS	META AD LIBRARY	GOOGLE ADS TRANSPARENCY CENTER
2023 PARLIAMENTARY ELECTIONS	Missing translations into Slovak language	Missing contact details of advertisers
2024 PRESIDENTIAL ELECTION	Missing translations into Slovak language	Missing contact details of advertisers
2024 EUROPEAN ELECTIONS	Missing translations into Slovak language	Missing contact details of advertisers

Based on the above findings, the CMS concluded that **from user perspective, the functionalities of the Meta's and Google's ad libraries remained unchanged during all three monitoring periods prior to the respective elections.** Furthermore, based on a comparison of findings resulting from the monitoring exercises, the CMS formulated the following findings:

- Meta Ad Library: missing details for characteristics and attributes of advertisements (such as advertisement targeting, etc.) in Slovak language may be perceived as problematic;
- Google Transparency Center: missing advertisers' contact details, there was only a message indicating that the "Identity of this advertiser has been verified". Article 12 of the TTPA provides for the obligation of publishers of political advertising to ensure that the transparency notice includes the identity of the sponsor and, where applicable, of the entity ultimately controlling the sponsor, including their name, email address, and, where made public, their postal address, and, when the sponsor is not a natural person, the address where it has its place of establishment. The effective date of this regulation is foreseen for October 2025, meaning it was not yet applicable for the monitored elections in 2023/2024. However, in the context of the 2024 European elections, it had become necessary to take into account the recommendation of Article 27(e) of the European

Commission Guidelines, advising providers of VLOPs and VLOSEs to prepare for the entry into application of the TTPA. Based on our findings, we consider the amount of information provided in Google Ads Transparency Center to be insufficient, as it does not contain all the relevant information about sponsors of the political advertisement.

2.3.2 Advertisements in user interfaces

Parliamentary elections

In case of **Meta**, content promoting a particular politician of a political party was detected in the *Instagram PC interface – Feed*. **It was not possible to establish with certainty whether this content was political advertising or regular content that was presented to the analyst during the monitoring exercise based on recommendations and virality**, as the post did not contain a disclaimer³⁷, the purpose of which is to indicate to users that the content in question is political advertising. The information about the payer of the advertisement was included in the text accompanying content; however, including such information in the wording of one's post is entirely at the discretion of the author/submitter of the post. However, upon examining Meta Ad Library, it was established that this post was also registered as a paid political advertisement, which was, at the time, active on both Facebook and Instagram.

In case of **Google**, a video advertisement was recorded on the *YouTube TV interface – Video* feature that plays before or during a video watched by a user on YouTube. The bottom left corner includes a statement, e.g. "Ad 1 of 2 0:05" and the bottom right corner includes a statement "About ad (i)". Clicking on (i) opens the About Ads window containing a link or a QR code the user can use to learn more about the advertisement from Google Ads Transparency Center. **There is no clear indication in the promotional video communicating to the user that the sponsored content is a political advertisement, and there is no information about who the advertiser is.** The CMS considers that the political advertisement presented in this manner does not meet the required standards of transparency.

Presidential election

No potential deficiencies were identified in frame of the monitoring of advertisements displayed in the user environment.

Compared to the results of the monitoring of the 2023 Parliamentary elections, the monitoring exercise carried out during the 2024 Presidential election on **Meta's** services **did not detect any content on the Instagram PC interface – Feed**, and thus **it was not possible to ascertain whether Meta had made changes to above-mentioned attributes of the user interface.**

In case of Google, **content was recorded in the user interface of the YouTube TV interface – Video** where the name of the entity sponsoring the content was added in the bottom left corner, which, in the CMS's opinion, demonstrated formal compliance with the required transparency standards.

European elections

No potential deficiencies were identified in frame of the monitoring of advertisements displayed in the user environment. In frame of the monitoring exercise carried out in the context of the European elections, **no advertising content was detected in the above-mentioned**

³⁷ "Disclaimer" is an indication for the user that the content is a paid political advertisement. For the monitored platforms operated by Meta and Google, the political advertising disclaimer both formally states that the content is "sponsored" and indicates who the payer of the sponsored content is, i. e. this public piece of information about the identity of the payer serves as an identifier for paid political advertising.

problematic user interfaces of Instagram and YouTube, and therefore **it was not possible to compare the current and previously established situation**.

Within the monitoring of the presentation of political advertisements on the platforms, the CMS focused on covering as wide a range of user interfaces as possible. However, it should be noted that, **in frame of the monitoring of the three election campaigns, it was not always possible to detect sponsored political advertisements on all platforms and in all user interfaces**. Please note, in context of the European elections, that the overall intensity and character of the campaign leading up to the European elections was affected by the attempted assassination of the Prime Minister of the Slovak Republic, Robert Fico, on 14 May 2024, i. e. when the election campaign was gaining in intensity. In response to this event, most political parties decreased the intensity of their campaign activities.

MEDIUM	PLATFORM	INTERFACE	PARLIAMENTARY ELECTIONS	PRESIDENTIAL ELECTIONS	EUROPEAN ELECTIONS
SMART-PHONE	Facebook	Reels (short videos)	X	✓	X
		Feed (main list of posts)	✓	✓	✓
		Interface around videos	✓	X	✓
	Instagram	Reels (short videos)	✓	✓	X
		Feed (main list of posts)	✓	X	✓
		Stories	✓	X	X
	Google	Search engine	X	X	X
	YouTube	Video	!	✓	X
		Shorts (short videos)	✓	X	X
PC	Facebook	Reels (short videos)	X	X	X
		Feed (main list of posts)	✓	✓	✓
		Interface around videos	X	X	X
	Instagram	Reels (short videos)	X	X	X
		Feed (main list of posts)	?	X	X
		Stories	X	X	X
	Google	Search engine	X	X	X
	YouTube	Video	✓	✓	✓
		Shorts (short videos)	X	X	X
SMART TV	YouTube	Video	✓	✓	X
		Shorts (short videos)	X	X	X
✓	no deficiencies detected for advertisements				
X	advertisement not detected				
!	missing advertiser identity				
?	impossible to establish if content promoting a political party was sponsored advertising or an organic viral post				

Based on a comparison of the results of the monitoring exercises carried out for these elections, the CMS formulated the following findings, which can be characterised as potentially problematic aspects related to sponsored political content in different user interfaces:

- as a part of the monitoring of advertisements on **Meta's** services during the 2023 Parliamentary elections, content was detected on the Instagram PC user interface – Feed **without a disclaimer specifying that this content was a political advertisement**, while this content was simultaneously recorded in Meta Ad Library as sponsored political content. Under the circumstances, the CMS was unable to determine whether this content was presented as an organic post or as sponsored political content published without an adequate political advertising disclaimer. The other monitoring exercises for election campaigns did not detect this type of content in the above-mentioned user interface;
- the monitoring of advertisements on **Google's** services during the 2023 Parliamentary elections detected sponsored content on YouTube TV user interface – Video with **no information about the sponsor/advertiser of this content, i.e. no clearly visible information indicating to the user that this sponsored content was a political advertisement**. As a part of the campaign monitoring for the 2024 Presidential election, the CMS found that Google **had changed attributes of this user interface and the deficiencies described above had been rectified**. However, this finding **could not be confirmed during the monitoring of the campaign preceding the European elections, as the monitoring exercise did not detect any content that would meet the attributes of political advertising in the user interface**;
- as illustrated by the descriptions of political advertisements presented in the user interfaces, the **monitored platforms use different ways to indicate in their user interfaces that content is sponsored political advertising** (icons for disclaimers embedded in different parts of the content, using different types of icons, using the identity of the sponsor/advertiser as an indicator that the content is political advertising, etc.). Formally, all such labelling meets the requirements for political advertising. However, from a practical point of view, the CMS considers that the above-mentioned **incoherence of the labelling used in different user interfaces, depending on the technological medium and service used, may prove to be confusing or even misleading for the average user of these services**. The DSA also foresees the unification of technical measures related to the prominent markings for advertisements and commercial communications by means of an international standard.³⁸ **The CMS therefore fully supports such unification, especially in order to ensure the efficient and transparent dissemination of information to the public and users about commercial content on online platforms.**

³⁸ [Article 44\(1\)\(h\) of the DSA](#): The Commission shall consult the Board, and shall support and promote the development and implementation of voluntary standards set by relevant European and international standardisation bodies, at least in respect of [...] technical measures to enable compliance with obligations relating to advertising contained in this Regulation, including the obligations regarding prominent markings for advertisements and commercial communications [...].

2.4 Specific cases of problematic content

During the monitoring of the 2023 Parliamentary elections, the 2024 Presidential election and the 2024 European elections, and the campaigns preceding these elections, the CMS did not detect any content that would meet the criteria of illegal content as defined by the relevant provisions of the AMS³⁹. The CMS did not receive any complaints from the public regarding the coverage of the elections on the platforms. However, all the monitored election campaigns exhibited instances of content related to the elections whose publication on VLOPs and VLOS could be perceived as problematic in terms of formal and content characteristics in the context of the applicable terms of service (“ToS”). In these cases, in accordance with the provision of Section 110(3)(q) of the AMS⁴⁰, the CMS contacted the operators of the respective services to report the presence of this content, requesting an examination of whether the publication of the reported content is in accordance with the applicable terms of service under the given circumstances. The following descriptions sum up the instances of problematic content detected in the context of the monitored election campaigns and the platforms’ evaluation of the escalated content.

Parliamentary elections

In the last week of the election campaign preceding the Parliamentary elections, i.e. in the week from 25 September 2023 to the election day on 30 September 2023, deepfake videos produced using AI technology, related to the Slovak political scene, were detected on the monitored platforms.⁴¹ These videos contained deceptive statements made by voices that were indistinguishable to the average listener from the real voices of the former President of the Slovak Republic, Zuzana Čaputová, and other publicly known candidates and publicly known journalists. Typical technical features of these videos included unnatural speech diction and accents as well as audible cuts in the soundtrack. The fact that the videos in question contained false information was in some cases supported by subsequent statements from the Police Force and independent fact-checkers contracted by the platforms to verify the authenticity of published information. This content went viral and cyclically appeared on all monitored platforms (Facebook, Instagram, YouTube, TikTok, X/Twitter⁴²). By this time, all of the platforms had defined rules in their terms of service for the use of inauthentic, synthetic content, or content using artificial intelligence (“AI”) tools. The publication of such content, which might pose serious risks or cause damage, or give the impression that real persons have made statements that they have never actually made, is not permitted on any of the platforms. A total of seven different types of content exhibiting these characteristics were detected. For the most widely disseminated content (an alleged phone call between the chairman of the *PS – Progresívne*

³⁹ [Article 151\(2\) of the AMS](#): For the purposes of the Act on Media Services, illegal content is defined as content that exhibits the characteristics of child pornography or extremist material; incites an act exhibiting the characteristics of any of the terrorist offences; or exhibits the characteristics of the criminal offence of denial and condoning of the Holocaust, crimes of political regimes and crimes against humanity, criminal offence of insult of the State, race and belief or criminal offence of incitement to national, racial or ethnic hatred (the definitions of the respective offences derive from Act 300/2005 Coll., i.e. the Criminal Code).

⁴⁰ [Article 110\(3\)\(q\) of the AMS](#): “The CMS is [...] empowered to cooperate with online content-sharing platforms in the efficient, proportionate and non-discriminatory application of the rules for the provision of their services.”

⁴¹ [Monitoring of platform functionalities in relation to the 2023 Elections to the National Council of the Slovak Republic](#), Chapter 3.4 *Deepfake videos created using AI technology*.

⁴² X was not included in any of the three pre-election monitoring exercises. This is due to its relatively low popularity among Slovak users and the fact that X is not a signatory to the Code of Practice on Disinformation. Nevertheless, if a deepfake video related to the elections was detected, the CMS contacted X’s operator, requesting an evaluation of the reported content.

Slovensko and a journalist, in which they discussed their alleged plans for vote-buying), several modifications were involved, such as embedding subtitles or illustrations in the video; however, these modifications did not affect the meaning and context of the video, which was supposed to be a leaked phone call whose interlocutors discussed their preparations for vote rigging.

If the CMS detected such content, based on its competences it contacted the representatives of the respective platforms, informing them of the circumstances of the presence of the content

SERVICE	TOTAL CASES OF REPORTED CONTENT	ONLINE	LABELLING	REMOVED
INSTAGRAM	2	2	-	-
FACEBOOK	48	19	14	15
TIKTOK	19	2	-	17
YOUTUBE	3	-	-	3
X (TWITTER)	1	-	1	-
TOTAL	100%	31%	21%	48%

and, requesting a case-by-case evaluation of the compliance of this content with their applicable terms of service. Based on their internal evaluations, the platforms either established that the content did not violate their terms of service, in which case the content remained publicly available online, or they found that the content did violate their terms of service and removed it, or they submitted the content for review by independent fact-checkers, which potentially led to its labelling⁴³. The following chart shows the results of content evaluation as of 24 October 2023.

Based on the above, the CMS concludes the following:

- in total, less than half (48%) of all deepfake videos that potentially interfered in the election campaign preceding the 2023 Parliamentary elections were removed from platforms’ pages after having been reported by the CMS;
- even in case of deepfake videos potentially interfering in the election campaign, platforms used the option to add an information label to such content (21% of all reported content), i.e. labelling – informing users of a given platform that a video contains false information. In spite of that, the platform still allows users to view, interact with (“like”), comment on and even share and disseminate such content;
- inconsistency of decision-making (in particular by Meta), where practically the same video (modified by embedding subtitles or illustrations, but always containing synthetically created voices similar to the voices of real persons, presenting false statements of the persons concerned) was removed and/or labelled, or resubmitted for

⁴³ An indication for the users of the platform informing them that a given video contains false information; in spite of that, the platforms still allow users to view, interact with (“like”), comment on and even share and disseminate such content.

review by an independent fact-checker, or evaluated as content compliant with the terms of service.

Presidential election

In the context of the 2024 Presidential election, a total of 91 cases of potential violation of the terms of service of the monitored platforms was recorded (occurring on Facebook, TikTok and YouTube⁴⁴). At the time, all of the platforms had defined rules in their terms of service that generally do not allow the publication of content that challenges the integrity of the electoral process and contains misleading information for voters about the results of the vote count. A majority of all potentially problematic cases detected consisted of content about the falsification of the vote count for the first round of the Presidential election, posted between 27 March 2024 and the date of the second round of the election on 6 April 2024 on Facebook. This content was published by users in several variations as text or a chart/an image, or a combination of both, or as a comment in the comment section under other content. In some cases, the content was modified. In addition to the alleged evidence of manipulation of the vote count, it also included claims that this activity was initiated by ESET and that similar practices had been used during the presidential elections in the USA and the Czech Republic. The common feature of all this content was the alleged existence of evidence supposedly proving vote rigging. These narratives were reviewed soon after by an independent fact-checker collaborating with the platforms to verify the veracity of the published information. On 28 March 2024, *Demagog.sk*, one of Meta's official fact-checkers, published a debunking report (refutation of false claims and information supported by relevant sources). Also, several sponsored links appeared on Facebook supposedly containing alleged leaked information of illegal practices of the runner-up in the second round of the Presidential election, Ivan Korčok. There have been several instances of content on TikTok and YouTube challenging the integrity of presidential elections in general, for example in the context of the results of the presidential elections in the USA, Brazil, etc.

If the CMS detected such content, based on its competences it contacted the representatives of the respective platforms, informing them of the circumstances of the presence of the content, and requesting a case-by-case evaluation of the compliance of this content with their applicable terms of service. Based on their internal evaluations, the platforms either established that the content did not violate their terms of service, or did not respond to the report, in which case the content remained publicly available online, or they found that the content did violate their terms of service and removed it, or they submitted the content for review by independent fact-

SERVICE	TOTAL CASES OF REPORTED CONTENT	REMOVED	SUBMITTED FOR VERIFICATION	NO REPLY
FACEBOOK	88	7	51	30
TIKTOK	1	1	-	-
YOUTUBE	2	2	-	-

⁴⁴ [Results of monitoring of platform functionalities in relation to the 2024 Election of the President of the Slovak Republic](#), Chapter 3.5 *Disinformation narratives about the candidates for the office of the President of the Slovak Republic and narratives challenging the official results of the Election of the President of the Slovak Republic*.

checkers, which potentially led to its labelling. The following chart shows the results of the content evaluations as of May 2024.

Based on the above, the CMS concludes the following:

- across all the platforms monitored in the context of the 2024 Presidential election, the highest number of instances of potentially problematic content (88 out of 91 detected cases) was recorded on Facebook operated by Meta. In case of TikTok (1 case) and YouTube (2 cases), the problematic content was removed from both platforms by their operators;
- Meta submitted the majority (51 out of 88) of the reported content to independent fact-checkers for verification. In a fraction of these cases (9 out of 51), Meta responded by applying a false information label. Furthermore, out of 88 reported instances, Meta removed content only in 7 cases. The content that was removed was primarily sponsored advertising content with information about the candidate (5 out of 7 instances of removed content), and at the relevant time prior to the second round of the election, Meta failed to react in 30 out of 88 cases;
- inconsistency in Meta's response to content that communicates the same narrative challenging the integrity of the electoral process/application of labelling as a tool informing users of the service of the presence of misleading content. Essentially identical posts (textual content in the form of text as opposed to a screenshot, or a post with a different illustration) are sometimes labelled and sometimes not. Furthermore, the CMS also considers Meta inconsistent in its response to content published as standalone content versus the same content published as a comment in the comment section.

[European elections](#)

For the 2024 European elections, a total of three cases (1 on Facebook, 2 on TikTok) of dissemination of a video created using AI tools were recorded. This video allegedly depicted Veronika Cifrová Ostrihoňová, an MEP candidate of *PS - Progresívne Slovensko*, dancing half-naked to music while making vulgar and lascivious gestures.⁴⁵ The service operators – Meta and Facebook – had defined rules in their terms of service for the use of inauthentic, synthetic content, or content using artificial intelligence (“AI”) tools. The publication of such content, which might pose serious risks or cause damage, or give the impression that real persons have made statements that they have never actually made, is not permitted on any of the platforms. If the CMS detected such content, based on its competences it contacted the representatives of the respective platforms, informing them of the circumstances of the presence of the content and, requesting a case-by-case evaluation of the compliance of this content with their applicable terms of service. In all three cases, the platforms proceeded to remove this content within a few hours.

Based on the above, the CMS concludes the following:

- in case of the 2024 European elections, **the incidence of potentially problematic content did not reach the same level and intensity as in case of the previous similar monitoring exercises carried out during the 2024 Elections to the National Council of the Slovak Republic and the 2024 Presidential election.** In the context of the Slovak platform environment, it should be noted that the overall intensity and character of the campaign leading up to the European elections was affected by the attempted assassination of the Prime Minister of the Slovak Republic, Robert Fico, on 14 May 2024, i. e. when the election campaign was gaining in intensity. In response to this event, most political parties decreased the intensity of their campaign activities;

⁴⁵ Part I of this monitoring report, [Chapter 2.7 Deepfake videos created using AI technology](#).

- in the context of the 2024 European elections, platforms' response to detection and reporting of potentially problematic content was rapid.

Based on the results of monitoring of election campaigns and the potentially problematic content detected, it was concluded that as far as the Slovak Republic is concerned, the **number of instances of potentially problematic content detected during the European elections in June 2024 was an order of magnitude lower than it was the case in the Slovak Parliamentary elections in September 2023 and the Presidential election in March and April 2024.**

As for the platforms, their ability and response rate for the EU-wide elections to the European Parliament were more effective compared to both the Slovak Parliamentary elections and the Presidential election. In this context, it is important to take into account the fact that the campaign preceding the EU-wide elections to the European Parliament was relatively calm and therefore the smaller amount of potentially problematic content detected was adequately reflected in the platforms' response and its intensity.⁴⁶ In contrast, **cases of potentially problematic content were previously detected in the local context of the Slovak Parliamentary elections and the Presidential election**, where a higher volume of content was detected that possibly indicated an intentional attempt to influence the course of these election campaigns. **Based on these findings, the response of platforms can be described as inconsistent in terms of application of statutory frameworks (such as the DSA) and their own terms of service,** mainly due to:

- in some cases, slow or no response to reported content in the relevant period during election campaigns;
- non-transparent application of labelling and re-submission of already debunked false content to independent fact-checkers for verification;
- removing or keeping identical content online based on internal evaluations of compliance with their own terms of service,
- different approach to different formats of content communicating the same narrative/text (text/screenshot of the same text/identical content published in the comment section).

⁴⁶ Conclusions of the EC [report](#) on the conduct of the European elections; Conclusions of the EDMO network post-election [report](#) on the EU elections; decreased intensity of the election campaign in the Slovak Republic due to the attempted assassination of the Prime Minister of the Slovak Republic, Robert Fico, on 14 May 2024.

CONCLUSION

Based on the monitoring and evaluation of the activities carried out by the platforms of Google, Meta and ByteDance, it can be concluded that digital platforms play an essential role in electoral processes of today. However, the findings highlight a number of areas where practices and approach to content moderation, user information, transparency of political advertising and cooperation with relevant authorities of the Member States require improvement.

One of the outputs of this comparative analysis is a recommendation for platforms to continue providing information about elections, including the voting process, rules and important dates, and to ensure that this information is accessible and consistent across all their services. It was found that compared to other platforms, users of Instagram received significantly less information. It is essential to focus on developing and sustaining long-term learning activities that are adapted to the local context and language. Platforms should also launch specific campaigns before elections that would be aimed at identifying disinformation, supported by relevant interactive tools, and evaluate their benefits and impact.

The analysis also highlighted the need for better cooperation between platforms and independent fact-checkers. This includes increasing fact-checking capacity and integrating verified information into the platform systems. This collaboration should be regular and systematic to ensure that verified facts are readily available to users. Platforms should put in place mechanisms to regularly measure and evaluate the impact of these activities.

Effective collaboration and awareness of new trends and local context or developments can help platforms prevent the viral spread of problematic content, including content created using AI tools and impacting electoral processes and voters' choices. This is why inconsistency in the evaluation and labelling of content remains a major problem, especially in case of deepfake videos and disinformation. Platforms need to improve their practices for moderating this content and ensure that there are no loopholes allowing for dissemination of false or manipulative information.

It is important for platforms to implement regulations and regulatory frameworks such as the DSA (Digital Services Act), the TTPA (Regulation on the transparency and targeting of political advertising) and to respect the status of the DSC (Digital Services Coordinator). Although the legislation clearly sets out the way forward, the application of these regulations by online platforms in practice has been inadequate. Issues such as missing translations on Meta's platforms, incomplete contact information for advertisements on Google's services or inconsistent labelling of advertisements indicate the need for long-term monitoring and compliance with these rules.

Given the dynamic environment of digital platforms, it is essential to continuously adapt rules and practices, in order to protect the integrity and fairness of electoral processes. As cooperation between platforms and relevant regulators intensifies, we expect to see improvements in provision of information and content moderation during elections.