



Annual Report

2024

DOT EUROPE ACTIVITIES
AT A GLANCE

DOT.
europe
Digital • Online • Tech



FOREWORD

With the European elections and the arrival of a new Commission, 2024 was less intense on the legislative front. Still, implementation work kept us busy, and we were among the first associations to focus on competitiveness and effort reduction – a conversation we helped shape with our recently published Digital Rulebook Simplification study.

It was also a year of growth and connection. Right after my start as Director-General, we moved into our shiny new office. Before the summer, we welcomed Alibaba as a new member. Two new colleagues joined us in the autumn: Andrea Montarolo, Policy Manager, and Mira Kaloshi, our first full-time Policy Communications Manager.

We piloted our first Quiz & Connect – a fun, informal networking event for policymakers and members. Given its success, a second edition is already in the works. The Online Services Governance Forum brought together DSA regulators, the European Commission, and members – and further underlined DOT Europe’s ambition to be the leading voice of online services at EU level.

On the communications front, we also stepped up our game: regularly publishing updates, articles, and statements, while experimenting with video content that drew greater attention and helped grow our following. 2024 served as a valuable reset – a moment to regroup, grow, and prepare. And 2025 has already kicked off at full steam.

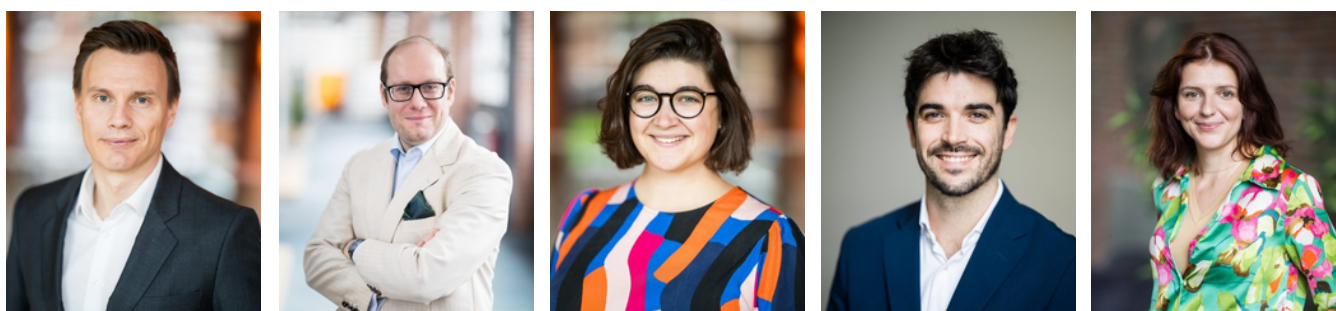
As always, thank you for your trust and support.

CONSTANTIN GISSLER
DIRECTOR GENERAL

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The 2024 DOT Europe team



In 2024, Constantin Gissler took up the role of Director General. The team also expanded with the arrival of Andrea Montarolo as Policy Manager, succeeding Francesco Bondi, who departed in April. Andrea now leads the Data and User Working Groups. That same month, Mira Kaloshi joined as DOT Europe's first full-time Policy Communications Manager, tasked with raising the association's profile and communicating its policy work across digital channels and traditional media.

DOT Europe also continues to benefit from the expertise of Director of Policy Elias Papadopoulos and Policy Manager Gwenaëlle Mercier, our longest-serving team member.

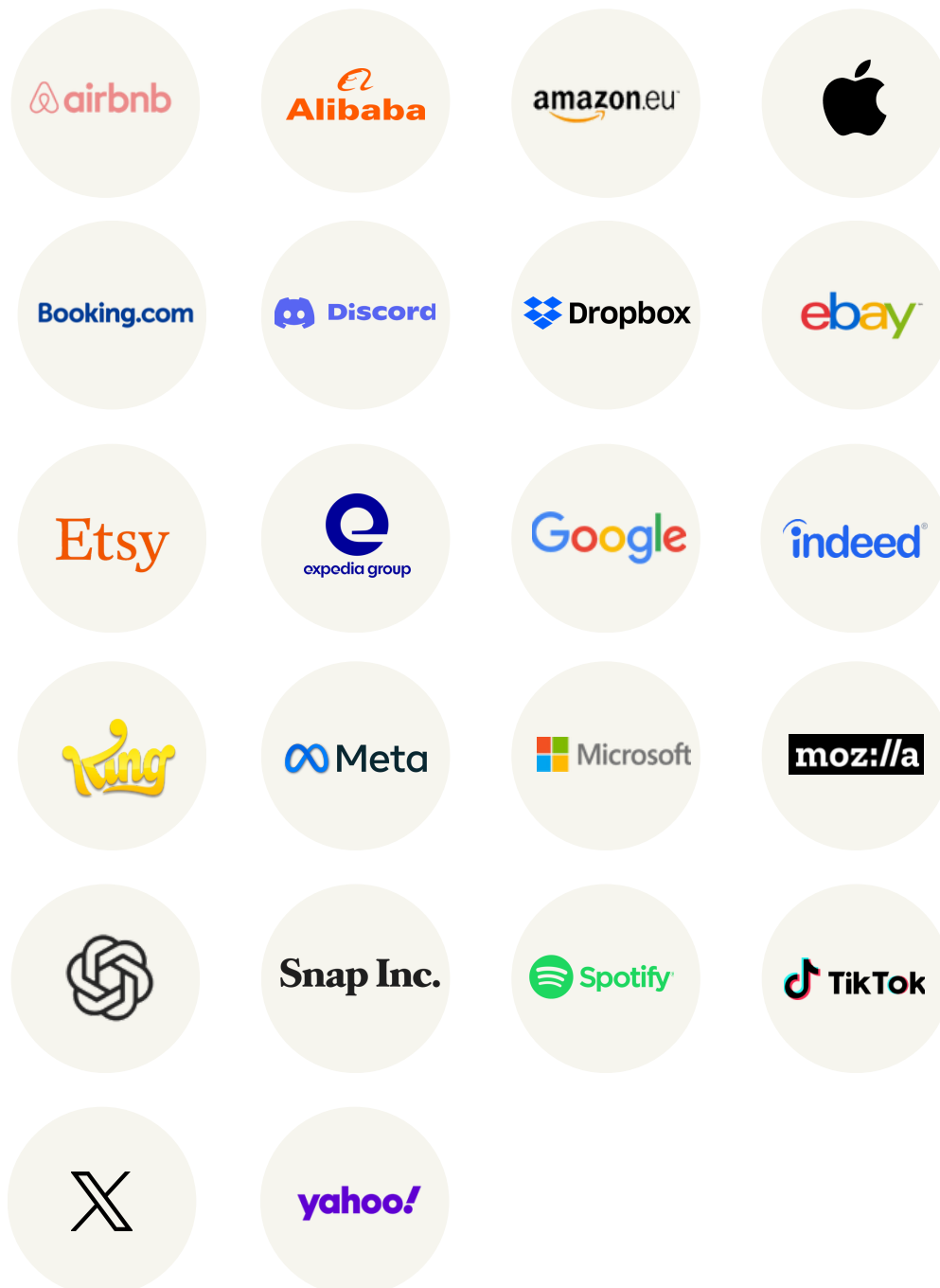
DOT Europe's board as of 2025

From left to right on the picture, Anna Zizola (X), Elisa Molino (Apple), Constantin Gissler (DOT Europe), DOT Europe President Ana Perdigao (Expedia Group), Emma Ascroft (Yahoo), DOT Europe Vice-President James Waterworth (Amazon), DOT Europe Vice-President Karen Massin (Google), Georgina Browes (AirBnB), Willy Duhén* (King). Missing on the picture is Olivia Regnier (Spotify) who joined the Board in April 2025.



*In April, Suzanna Temple-Morris (King) joined the Board taking over for Willy Duhén who has left King.

DOT Europe's members as of 2025



OUTREACH & COMMUNICATIONS



Outreach

2024

↑ **446**

Stakeholder meetings

↑ **18**

Speaking engagements



↑ **33**

Meetings with European Commission officials

↑ **45**

Meetings with European Parliament Members and officials

↑ **30**

Meetings with Member State and Council officials



Channels



LinkedIn analytics 2024-2025

↑ **2.624**

Followers

↑ **2.278**

Reactions in 2024

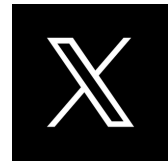
↑ **129.734**

Post impressions in 2024



- Since September 2024, with the addition of a full-time Policy Communications Manager, we have implemented a refreshed communications strategy on LinkedIn and X, centred on a consistent weekly posting cadence. Our content now spans a variety of formats, including graphics, videos, and editorial pieces.
- We have strengthened our thought leadership by publishing more articles and positioning the team as subject-matter experts across key digital policy areas.
- In addition, we launched two new newsletters: *A Week with DOT*, a weekly roundup of digital policy developments, and *On the DOT*, a monthly update on DOT Europe's activities and milestones.
- While our focus has primarily been on organic content, we have begun to explore paid campaigns to further expand our reach.

Channels



X analytics 2024-2025

↑ **3.004**

Followers

↑ **1.400**

Engagements

↑ **18.500**

Post impressions



Events

25 March 2024 - CSA briefing with the Belgian Presidency



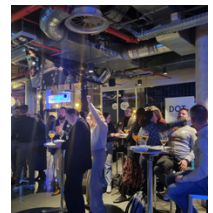
22 April 2024 - Journalist Drinks

25 April 2024 - GDPR Procedural Rules Webinar



28 October 2024 - Members Drinks

15 November 2024 - Quiz&Connect



21 November 2024 - Digital Services Governance Forum I



Media

In 2024 we were mentioned in



- We adopted a proactive media engagement strategy to ensure consistent visibility on key policy files. This approach has helped us build strong and trusted relationships with journalists and media professionals.
- Our work has been featured in expert newsletters and leading outlets such as Contexte, Politico, Euractiv, MLex, Euronews, as well as a national publication, the Svenska Dagbladet (SvD) in Sweden.
- We are actively exploring opportunities to further increase our presence in national media across Europe.

CONTENT WORKING GROUP



Digital Services Act

Looking back at 2024

February 2024 marked the full application of the Digital Services Act (DSA). While this was intended to signal the operational rollout of the DSA toolbox, many Member States had yet to designate their Digital Services Coordinators, leaving smaller online service providers without clear guidance on compliance. At the same time, the first formal investigations into Very Large Online Platforms (VLOPs) and Search Engines began, alongside new designations of additional platforms, including e-commerce and adult-content services, as VLOPs.

Our asks

- Throughout 2024, DOT Europe consistently highlighted instances where Commission proposals risked going beyond the scope of the DSA, particularly in our responses to public consultations.
- We also monitored national legislation that encroached on areas harmonised by the DSA and supported the Commission's efforts to address such cases with the relevant Member States.
- We spoke out against additional legislation at EU or national level on aspects already regulated by the DSA.

Our actions

Throughout 2024, we contributed to numerous Commission consultations and followed up with the Platforms Directorate, including by requesting meetings in January, April, and June.

In November, we organised the first Online Services Governance Forum, which brought together 70 participants, including representatives from over a dozen Digital Services Coordinators.

We also drafted and submitted memos to the Commission mapping instances of conflicting legislation and contributed to TRIS notifications, based on concerns flagged by our members.

CSA Regulation

Looking back at 2024

The European Parliament adopted its negotiating position in November 2023. Despite the shifts in political dynamics following the elections, the Parliament chose not to revise its report in 2024. In January, the LIBE Committee adopted its position on extending the derogation from the e-Privacy Directive approving a one-off extension until May 2025 - fifteen months shorter than the Commission's original proposal.

While the Council agreed in principle to the extension, the Law Enforcement Working Party was unable to reach consensus under the Belgian and Hungarian Presidencies. The deadlock centered on detection orders and end-to-end encryption.

Our asks

- Given complex negotiations in Council, DOT Europe focused on one clear priority: securing a legal basis for interpersonal communication services to detect, report, remove, and prevent the dissemination of CSAM.
- We cautioned against any weakening of end-to-end encryption and urged the Council to exclude unknown CSAM and grooming content from their scope.
- DOT Europe also highlighted issues of importance, including age verification and responsibilities of cloud providers.

Our actions

DOT Europe maintained its network of child-focused NGOs and coordinated a joint statement calling for an extended timeline for the derogation to the ePrivacy Directive. This statement was featured in three Brussels-based newsletters.

We regularly contributed to discussions in the Council by providing feedback and responses to proposed compromise texts. In March, DOT Europe organised a briefing for staff of the Belgian Presidency to present its position and a proposed amendment to the text. This proved successful, as DOT Europe's suggestions were reflected in a subsequent compromise text.

We also held a meeting with the incoming Hungarian Presidency at the start of its mandate. A study on the legal basis was commissioned from a researcher and published in April. We ran a communications campaign around the study and engaged with several attachés to raise awareness of its findings. Our dialogue with lawmakers in the European Parliament continued, ensuring they remained informed about developments on the file.

Better Internet for Kids Strategy +

Looking back at 2024

DOT Europe continued to contribute as an expert member of the Special Group tasked with drafting the Age-Appropriate Design Code, as outlined in the EU Strategy for a Better Internet for Kids (BIK+). However, in April, DG CNECT's BIK+ Unit decided to pause work on the Code to prioritise the development of Article 28 Guidelines under the Digital Services Act.

Our asks

- We continued to advocate for a coherent, EU-level framework on child online safety - one that includes age assurance measures while recognising both their opportunities and risks.
- We outlined key principles for EU policymaking in this area, calling for a risk-based and proportionate approach grounded in a risk-benefit assessment.
- While our members hold diverse views on age assurance, DOT Europe succeeded in building consensus around several core principles: building on the existing ecosystem, stakeholder collaboration, a risk-based and flexible approach, privacy preservation, effectiveness, accessibility, affordability, and interoperability

Our actions

We updated our position paper on child safety online in early 2024 and shared it with the European Commission and industry peers. We also met with the BIK+ Unit to present and discuss our recommendations.

As a member of the Special Group, we participated in a presentation and discussion on the forthcoming Article 28 Guidelines in May, which we followed up with our response to the Commission's call for evidence.

Other active and monitoring issues

AI & Copyright

DOT Europe adopted its position paper on AI & Copyright in November 2024 with a primary focus on the importance of the TDM exception for innovation in AI. The balance struck in Article 4 of the CDSM Directive is the right solution to ensure the use of datasets at scale, which is necessary for AI training and the development of responsible AI. DOT Europe participated in the stakeholders meeting organised by MEP Axel Voss at the end of the year.

European Media Freedom Act

Following adoption of the Media Freedom Act in spring 2024, the provisions relevant to VLOPs will enter into force in August 2025. DOT Europe met with ERGA representatives in the summer of 2024 to start the discussion on the implementation of the Act. The Content Working Group also had an extensive meeting with Anna Herold on 21 November in view of the implementation.

AVMSD evaluation

At the end of 2025, DOT Europe mapped regulatory initiatives aimed at influencers, or online content creators. We also followed closely the Belgian Presidency's initiatives on the topic. We adopted talking points on the topics which fed into our work in view of the Digital Fairness Act.

DOT Europe met with Anna Herold in November to discuss avenues for the evaluation and potential review of the AVMSD in 2026.

Discoverability European content online

We took part in stakeholder workshops organised by DG EAC contractors to gather evidence on the prominence of European content in the book and music sectors.

USER WORKING GROUP



AI Act

Looking back at 2024

After a trilogue agreement was reached in late 2023, the Act was published in the OJ in July 2024 and entered into force in the beginning of August. In Q3-Q4 2024, the European Commission began working on its GPAI Code of Practice, as well as on guidelines for the definition of AI system and prohibitions.

Our asks

- Maintain and safeguard the risk-based approach of the AI Act.
- Avoid introducing additional obligations not foreseen in the core text through guidelines and Codes of Practice.
- Ensure information disclosure that balances compliance obligations with the protection of IP and trade secrets.
- Put in place a legislative framework for AI that supports innovation and encourages adoption of AI technologies in the EU.

Our actions

Between trilogue agreement and the publication of the AI, we focused our efforts on understanding the most relevant deliverables of the AI Act to better plan our activities. part of 2024 saw the preparations for the publication of the AI Act in the OJ.

DOT Europe undertook a mapping of the various deliverables of the AIA to identify priorities for members.

In Q3-Q4 we focused our attention on the GPAI Code of Practice consultation and the consultation on the definition of AI systems. DOT Europe participated in relevant consultations and undertook comms activity to promote industry views on the Code.

We also organised meetings with relevant officials and gathered intelligence on relevant developments.

Digital Fairness Act

Looking back at 2024

The key milestone in 2024 was the publication of the European Commission's REFIT report in the beginning of October. The observations of this report will lead to the Digital Fairness Act, expected in H2 2026, with a public consultation to be launched end May / early June 2025.

Our asks

- Question the need for a DFA, given that most of the shortcomings identified in the REFIT report can be addressed through existing legislation and / via non-legislative means.
- Ensure that any regulatory intervention is only addressed at clearly identified gaps and avoids overlaps with existing rules.
- Focus should be placed on enforcement of existing rules rather than the introduction of new ones.

Our actions

We launched a series of deep dives into issues that are likely to feature in the DFA (dark patterns, personalization, addictive design, subscription and enforcement).

We undertook a detailed analysis of the REFIT report and launched an informal coalition with other trade associations for information exchange and coordination.

We also started a series of meetings with Permanent Representations and MEPs, which continues into 2025, to share our views on the DFA.

Other active and monitoring issues

AI Liability Directive

As discussions on the AILD were expected to intensify after the finalisation of the AI Act, DOT Europe updated its position in 2024. We questioned the necessity of this proposal, but also offered recommendations on how to improve the text, should policy makers continue working on the file. In the 2025 Work Programme, the European Commission decided to withdraw this proposal.

Product Liability Directive

Trilogue agreement on the file was reached in late 2023. DOT Europe monitored for any updates on implementation and publication in the Official Journal. The PLD was published in the OJ on 11 November 2024.

Toy Safety Regulation

DOT Europe monitored developments on the file and undertook targeted engagement in response to amendments that created conflicts with or undermined obligations under the DSA.

DATA WORKING GROUP



GDPR procedural rules

Looking back at 2024

The European Parliament adopted its position in April, followed by the Council in June. Negotiations have been initiated under the Hungarian Presidency, with a first trilogue held on 4 November 2024, followed by 7 Interinstitutional Technical Meetings. A second trilogue took place on 12 December 2024, leading to a provisional agreement on rules on information exchange, confidentiality and access to the file, and a dedicated procedure for the early resolution of complaints.

Our asks

- Respect the confidentiality and trade secrets of the party under investigation, and limit the complainant's access to the administrative file.
- Preserve the One-Stop-Shop mechanism by keeping exceptions strictly limited.
- Avoid placing excessive burdens on supervisory authorities.
- Promote amicable resolution as an effective alternative to the formal complaint process.
- Ensure a meaningful right to be heard for parties under investigation.

Our actions

We commissioned law firm Wilson Sonsini to draft a legal analysis of the European Parliament's position highlighting how it clashed with fundamental rights and concepts of the GDPR. We held a webinar to present findings to Member State representatives. DOT Europe undertook an intensive outreach programme in the EP and Council before the finalisation of their positions.

After the start of trilogues DOT Europe shared its trilogue recommendations with policymakers (European Parliament, Council and European Commission) and undertook another extensive outreach programme to present its priorities.

Telecoms - Digital Networks Act

Looking back at 2024

The European Commission published its White Paper on the Future of Telecoms in February. The EC is now preparing a Digital Networks Act, scheduled for Q4 2025. This will be a revision of the European Electronic Communications Code.

Our asks

- Avoid network fees in any shape or form, including dispute resolution mechanisms.
- Explore country of origin principles for NIICs services.
- Clarify the EC's intentions as to cloud and private networks avoiding any unjustified extension of the regulatory framework to services that do not amount to electronic communications services.

Our actions

We responded to the White Paper public consultation and promoted our key messages with dedicated comms activities.

We drew attention to a number of issues, including the fact that the concept of a dispute resolution mechanism amounts to network fees in a different guise.

We continued monitoring for developments and intelligence on this issue, attended relevant events and joint industry initiatives. We invited DG CNECT's Peter Stuckmann to attend the Data WG in early 2025 to discuss telecoms policy with members.

Other active and monitoring issues

GDPR evaluation

In the context of the 2024 evaluation of the General Data Protection Regulation (GDPR), DOT Europe submitted its views, affirming that the Regulation continues to function effectively and does not require revision. We argued that any perceived shortcomings should be addressed through interpretative guidance rather than changes to the legislative text.

ePrivacy

DOT Europe developed and shared an updated position on the ePrivacy Regulation with the European Commission. In June, we welcomed Agata Pavia, Head of Unit, and her team to our Data Working Group meeting to discuss the way forward.

We advocated for the withdrawal of the outdated ePrivacy Regulation, which no longer reflects the technological and legislative landscape it was intended to address. Should the Commission decide to replace it, we recommended a more limited and focused approach - addressing relevant issues through targeted legislation rather than a broad, all-encompassing proposal.

The European Commission has since indicated in its 2025 Work Programme that it intends to withdraw the current ePrivacy proposal, although it remains unclear what legislative initiative, if any, will follow.

Data Act

We closely monitored the implementation of the Data Act throughout 2024 and maintained regular contact with relevant officials at DG CNECT. These officials also joined meetings of our Data Working Group to exchange views directly with members.

EDPB Opinion on AI training

DOT Europe played an active role in shaping the European Data Protection Board's Opinion on AI training. We led a Joint Statement supported by 14 organisations, which was shared with both the EDPB and the media, and submitted our position ahead of the Opinion's release. We also presented our position in the EDPB stakeholder workshop on 5 November.

Cookie pledge

DOT Europe remained engaged in the European Commission's Cookie Pledge process, voicing industry concerns about the initiative's consistency with existing privacy law and its practical effectiveness. Ultimately, the Commission chose to discontinue the pledge. However, insights gained from the process are expected to inform future initiatives, including a possible Digital Fairness Act.

Thank you.

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