



# Annual Report 2025

DOT EUROPE ACTIVITIES  
AT A GLANCE

**DOT.**  
europe  
Digital • Online • Tech



# FOREWORD

It is a privilege to introduce DOT Europe's 2025 Annual Report, even as someone who joined the organisation at the very start of 2026. While I did not have the opportunity to be part of the journey this report captures, I have had the distinct advantage of stepping into an organisation with much to be proud of.

Reading through the work carried out over the course of 2025, I have been struck by the dedication and professionalism of our teams, the strength of our member relationships, and the significance of the policy debates in which DOT Europe has played an active role. This report stands as a testament to those efforts.

The policy landscape in which we operate continues to evolve rapidly, and 2025 was no exception. DOT Europe remained at the forefront of key discussions, advocating on behalf of its members and contributing meaningfully to the shaping of digital policy across Europe.

As I look ahead, I do so with confidence, grounded in the solid foundations this report reflects. I am committed to building on this work and to continuing to serve our members with the rigour and ambition they deserve.

I trust you will find this report both informative and reflective of the important contributions DOT Europe makes to the European digital policy environment.

**BEN BRAKE**

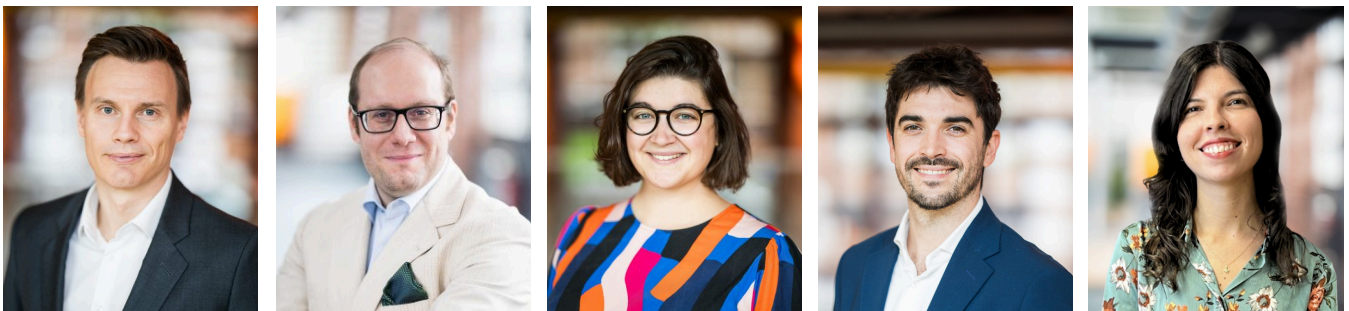
DIRECTOR GENERAL

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# The 2025 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.

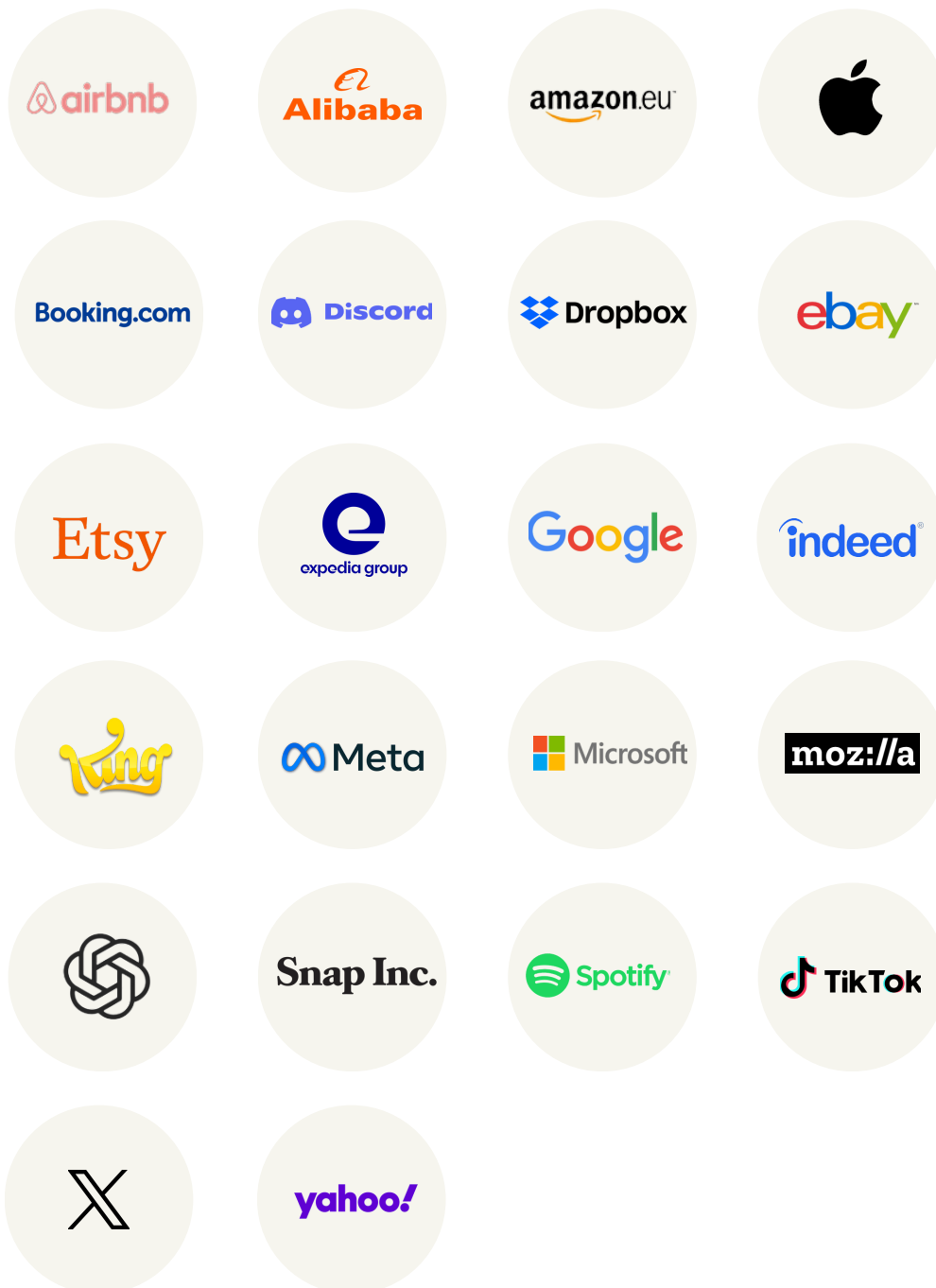
# DOT Europe's board as of 2025

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

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# Outreach

2025

↑ **480**

Stakeholder meetings

↑ **20**

Speaking engagements



↑ **29**

Meetings with European Commission officials

↑ **31**

Meetings with European Parliament Members and officials

↑ **22**

Meetings with Member State and Council officials



# Channels



LinkedIn analytics 2025

↑ **3.264**

Followers (+25%)

↑ **2.278**

Reactions in 2025 (+8%)

↑ **150.429**

Post impressions in 2025 (+16%)



- In September 2025, Fernanda joined and started the development of a new communications strategy for DOT Europe's LinkedIn presence, centred on clearly delineating our audiences and enhancing the organisation's public image and unique selling points.
- The posts followed a consistent weekly cadence, spanning a variety of formats, including articles, graphics, videos, and carousels.
- We have strengthened our thought leadership by publishing more articles and positioning the team as subject-matter experts across key digital policy areas.
- We started a process a re-branding process, scheduled to be launched in June 2026

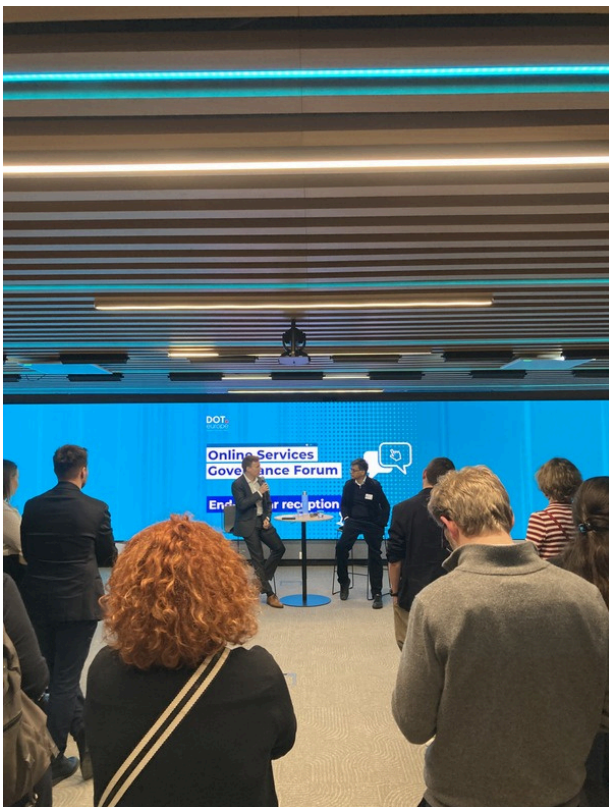
# Events

**30 April 2025** - Digital Services Governance Forum II

**19 June 2024** - DOT Europe's 25<sup>th</sup> Anniversary

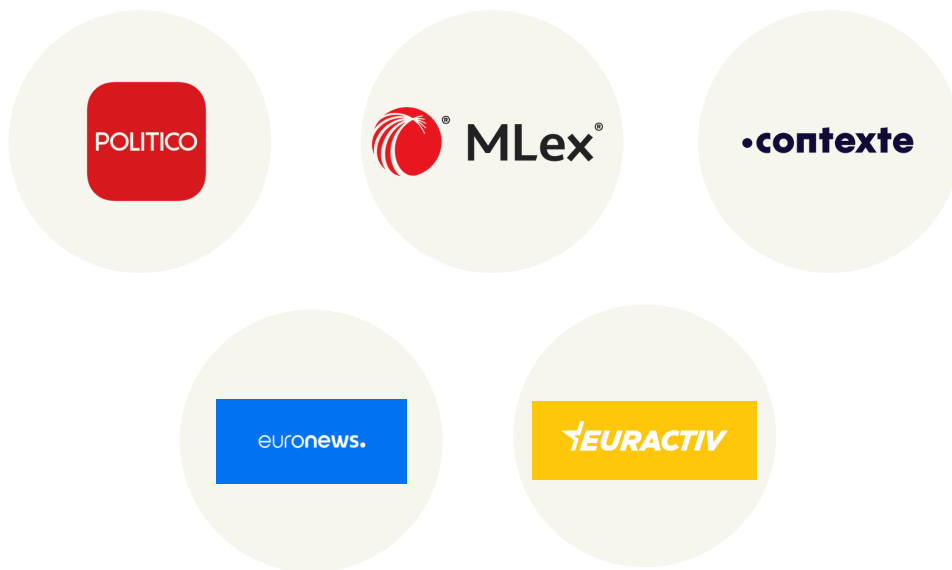
**18 November 2024** - Digital Services Governance Forum III

**13 November 2025** - Quiz&Connect



# Media

In 2025 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.
- We are actively exploring opportunities to further increase our presence in national media across Europe.

# CONTENT WORKING GROUP

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# Digital Services Act

## Looking back at 2025

In 2025, the DSA's enforcement continued. Guidelines on protecting minors on online platforms were also issued. Member States advanced their national enforcement capacity by designating and empowering Digital Services Coordinators, certifying trusted flaggers and out-of-court dispute settlement bodies, and cooperating within the European Board for Digital Services.

The Commission also prepared its first evaluation under Article 91, underscoring the extent to which the DSA overlaps with the rest of the EU legislative framework.

The DSA also was at a centre of geopolitical discussions, with allegations on its misuse for censorship and spillover effects outside the EU.

## Our asks

**Stay within the scope of the DSA.** The Commission should ensure that new proposals remain within the boundaries of the DSA's original mandate. DOT Europe consistently highlighted instances where Commission initiatives risked exceeding that scope, including through responses to public consultations.

**Address conflicting national legislation.** The DSA's effectiveness depends on consistent application across Member States. DOT Europe monitored cases of conflicting national legislation and supported the Commission in its efforts to ensure harmonisation.

## Our actions

Throughout 2025, DOT Europe engaged actively with the key stakeholders and policy processes shaping the DSA's implementation.

In February, we participated in the opening session of the Code of Conduct on Advertising and, in March, we took part in the related workshops. We spoke at the European Parliament's IMCO committee, contributing to hearings on the implementation of the Digital Services Act. Additionally, DOT Europe's Director General met with Prabhat Agarwal, further strengthening key institutional relationships.

In April, DOT Europe returned to the IMCO committee for a further hearing on DSA implementation, and hosted its second Online Services Governance Forum (OSGF) event, bringing together stakeholders to advance dialogue on digital policy priorities.

The summer months brought more opportunities to shape the regulatory conversation. In July, DOT Europe submitted its simplification study to the European Commission in response to an EU survey examining the interaction of the DSA with other EU legislation, an important contribution to the broader debate on regulatory coherence.

In November, with DOT Europe organising its third OSGF event, reflecting the organisation's growing role as a convener of meaningful industry and policy dialogue.

# CSA Regulation

## Looking back at 2025

2025 finally saw meaningful progress on the Child Sexual Abuse Regulation. The Polish Presidency made limited advances in the first half of the year, but when Denmark assumed the Council Presidency in **July**, advancing the CSAR became an explicit priority.

By autumn, Denmark had steered the Council toward a compromise that preserves the goals of the Commission's 2022 proposal while excluding mandatory detection orders. The Council formally adopted its position on 26 November 2025, and trilogue negotiations with the European Parliament – which had been ready since 2023 – and the Commission opened on 9 December 2025.

Key institutional differences, most notably on detection orders, remain to be resolved in the negotiations ahead.

## Our asks

**Secure a legal basis for voluntary detection.** DOT Europe defended the right for interpersonal communication services to voluntarily detect, report, remove, and prevent the dissemination of CSAM.

**Protect end-to-end encryption.** Any framework must preserve end-to-end encryption as a cornerstone of digital security and user privacy.

**Focus detection orders on known CSAM.** We urged the Council to exclude unknown CSAM and grooming content from detection orders.

**Exclude age verification from the Regulation.** Age verification should not be discussed in the context of child sexual abuse. It deserves a separate and more holistic approach.

**Prioritise the right actors for removal mandates.** We defended that cloud providers should not be the primary targets of removal mandates.

## Our actions

Throughout 2025, DOT Europe followed developments on the CSA Regulation closely, with engagement intensifying in the second half of the year as negotiations accelerated.

In September, DOT Europe conducted targeted outreach to ambassadors and attachés on the Regulation, proactively approaching engagement with the Council. In October, we provided formal feedback on the Danish Presidency's compromise text. In November, DOT Europe took up speaking opportunities on the protection of minors online, including by the Danish Presidency of the Council, strengthening our visibility as stakeholders in this policy space.

Beyond the Regulation itself, DOT Europe partnered with child rights NGOs to advance a position that AI-generated child sexual abuse material should be treated as a criminal offense.

# USER WORKING GROUP



# AI Act

## Looking back at 2025

2025 marked the AI Act's first year of implementation in earnest. Key provisions became applicable on 2 February, including the prohibition of unacceptable-risk AI practices and the obligation for organisations to promote AI literacy. Throughout the year, the Commission and the AI Office focused on developing the governance framework, issuing guidance, and finalising the General-Purpose AI Code of Practice ahead of the application of GPAI obligations on 2 August.

In November, the Commission launched the AI Omnibus as part of its broader simplification agenda — seeking to reduce regulatory burdens, improve legal clarity, and better align compliance timelines with the availability of standards and guidance.

Copyright also emerged as one of the most contested dimensions of AI regulation in 2025. The drafting of the GPAI Code of Practice prompted extensive debate between rightsholders, AI developers, and policymakers, with the creative sector raising concerns about transparency requirements, rights reservation mechanisms, and the enforceability of copyright protections in the context of AI training.

## Our asks

**Keep the GPAI Code of Practice within scope.** The Code should not introduce requirements that go beyond the obligations set out in the AI Act.

**Safeguard trade secrets.** Transparency obligations must not compromise legitimate business confidentiality.

## **Preserve the existing copyright framework.**

The TDM exception under Article 4 of the Copyright Directive covers AI training and should continue to provide legal certainty. The legislative debate should not be reopened.

**Ensure coherence between the AI Act and the GDPR.** Targeted simplification measures are needed to reduce overlaps and unnecessary compliance burdens.

## **Extend deadlines for high-risk AI systems.**

Compliance timelines should reflect the actual availability of harmonised standards, guidance, and compliance tools.

## Our actions

DOT Europe was designated as an active member of the GPAI Code of Practice, contributing consistently throughout the drafting process through to the Code's publication in June. We also met with Killian Gross of the AI Office, the official responsible for leading the drafting process, strengthening a key institutional relationship.

Technical engagement continued throughout the year, with DOT Europe responding to multiple consultations on GPAI models, incident reporting, and high-risk AI systems. On copyright, we published our official position paper in January and drafted a reaction to MEP Voss' report in September, which served as the basis for policy outreach and bilateral meetings in the second half of the year.

On simplification, DOT Europe published its simplification study in April — several recommendations of which were taken up by the Polish Presidency, including the call for guidelines on the interplay between the GDPR and the AI Act. In December, DOT Europe was appointed to participate in the drafting of the Code of Practice under Article 50, a process beginning in January 2026.

# Digital Fairness Act

## Looking back at 2025

In 2025, the European Commission positioned the Digital Fairness Act as its flagship consumer protection initiative. It was first announced as a part of the upcoming Consumer Agenda 2025–2030, followed by a dedicated call for evidence for an impact assessment.

The DFA's policy scope was framed around addressing manipulative interface design, misleading influencer marketing, addictive design and online profiling – with a transversal focus on protection of minors, reducing compliance burdens, and improving enforcement coherence with existing instruments like the DSA.

Concomitantly, the European Parliament urged for a broader scope that would include digital addiction, online gambling, targeted advertising, and dark patterns.

## Our asks

**Enforce existing rules before adding new ones.** DOT Europe advocated for a measured and coherent approach to EU digital regulation, prioritising effective enforcement and thorough assessment of existing legislation before introducing additional obligations.

**Address clearly identified gaps only.** The DFA should target genuine regulatory gaps rather than adding further complexity to an already dense EU digital rulebook.

**Take a risk-based and proportionate approach.** New rules should target demonstrable harms without resorting to blanket bans or prescriptive design requirements that risk stifling innovation.

### **Preserve the benefits of digital services.**

Personalisation, recommendations, and tailored digital experiences deliver real value to consumers. Any safeguards should be designed with that in mind.

**Deliver legal certainty and simplification.** In line with the Better Regulation agenda, any new rules must be clear, predictable – and workable for both consumers and businesses.

## Our actions

In 2025, DOT Europe engaged extensively on the Digital Fairness Act and broader consumer protection developments. We responded to the DFA targeted questionnaire, submitted feedback as part of the call for evidence, and participated in the consultation on the Consumer Agenda 2025–2030. In July, we took part in the Commission's Implementation Dialogue on Consumer Protection in the Digital Environment.

Institutional outreach spanned Permanent Representations, consumer protection authorities and ministries across Member States, policy advisors in the European Parliament, and Commissioner Virkkunen's Cabinet.

On specific issues, DOT Europe attended the CPC workshop on in-game virtual currencies, published a position paper on subscriptions, led an industry statement on the DFA, and took the floor at the Consumer Summit in May.

# DATA WORKING GROUP



# GDPR / Digital Omnibus

## Looking back at 2025

The first half of 2025 was relatively subdued on the data protection front, as the European Commission began signalling the possibility of simplifying the GDPR alongside a series of consultations aimed at streamlining the broader European data framework.

The pace picked up considerably in the second half of the year. In November, the European Commission published its Digital Omnibus, a landmark package designed to simplify the data framework – and the first concrete attempt by the Commission to reform the GDPR without altering its core principles. This was accompanied by the Data Union Strategy, to whose development DOT Europe actively contributed, further cementing the organisation's role in shaping EU data policy.

## Our asks

**Focus on enforcement, not reform.** The fundamental challenge posed by the GDPR lies in its enforcement rather than the Regulation itself.

**Clarify the interplay between the GDPR and the AI Act.** Clear guidance on how they interact in practice would significantly reduce compliance complexity for businesses.

**Repeal the ePrivacy Directive.** DOT Europe called for consolidating overlapping provisions under the directive and the GDPR, eliminating the current dual regulatory regime.

## Our actions

The year began with an intense focus on the GDPR Procedural Rules file, which reached a final agreement in April. DOT Europe prioritised direct engagement with policymakers in both the European Parliament and the Council throughout the process.

In June, DOT Europe updated its GDPR position to align with the Commission's simplification agenda. In September, Björn Juretzki, Head of the Data Unit at DG CNECT, invited DOT Europe to provide input on the forthcoming Data Union Strategy.

In October, DOT Europe exchanged views with Olivier Micol, former Head of the Data Protection Unit at DG JUST, on the upcoming Digital Omnibus. In November, we began drafting amendments focusing on three priority areas: the definition of personal data, cookie rules, and the legitimate interest basis for training AI models.

In December, DOT Europe was invited to participate in the EDPB workshop on pseudonymisation guidelines — a further mark of the organisation's growing standing in EU data protection policy.

# Digital Networks Act

## Looking back at 2025

In 2025, the European Commission advanced preparations for the Digital Networks, a major initiative aimed at modernising the EU framework for electronic communications and digital connectivity. Building on the 2024 White Paper on Europe's digital infrastructure needs, the Commission launched a call for evidence and a public consultation in June to gather stakeholder input on reducing regulatory fragmentation, facilitating cross-border operations, stimulating investment in advanced networks, and supporting the deployment of fibre, 5G and future 6G infrastructure. The DNA was included in the Commission's 2025 Work Programme, with a legislative proposal scheduled for adoption by the end of the year.

## Our asks

**Remove any conciliation or "fair share" mechanism.** DOT Europe called for the removal of any mechanism that could require content and application providers to pay telecoms operators for carrying traffic.

**Avoid additional obligations for number-independent interpersonal communication services.** The DNA should not introduce new regulatory burdens for NIICS providers, who are already subject to a comprehensive EU regulatory framework.

**Preserve the General Authorisation Regime as it stands.** Expanding it beyond its current boundaries would create disproportionate compliance burdens and legal uncertainty for a wide range of providers.

## Our actions

In 2025, DOT Europe updated its position on the Digital Networks Act in response to the Commission's call for evidence, which formed the basis of the organisation's engagement with policymakers throughout the year.

DOT Europe also invited Peter Stuckmann, the DG CNECT official responsible for the DNA, to exchange views directly with members ahead of the publication of the legislative proposal – ensuring that industry priorities were heard at an early and influential stage of the process.

# Thank you.

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