



# Annual Report

2024

Date: 05-2025

Data Rights France, registration number: W732010735  
Stichting Data Rights, Chamber of Commerce registration number: 76158799

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## Preliminary Information

This first annual report marks the beginning of Data Rights' activities as a non-profit, receiving money and paying for its first employee and consultant.

Data Rights has two legal entities, a Dutch one established first on the recommendations of international foundations, and a French one established later for legal purposes in relation to data protection cases. When preparing to receive its first core grant the team was not able to open a bank account in the Netherlands as no one was living in the Netherlands. We therefore pivoted to Data Rights France to become the recipient of funding and employer of the workforce, at least for now.

Data Rights' first employee started to work on 20/03/2024, from Germany. This has made the establishment of accounts slower as French and German accounting firms, as well as specialised attorneys, were unsure of the country in which accounts would need to be done. The matter was closed by French non-profit support authorities, who found that accounts were to be done by accountants based in France. At the time of writing for this report the accounts are being reviewed by Data Rights' accounting firm ('cabinet d'expertise comptable'), Yzico. You will find at the end of this report Yzico's summary of Data Rights (France) accounts for 2024

The Open Society Foundation (OSF) needed to send funds by January 2024 due to its swift departure from the European Union. To enable the smooth reception of OSF money after the January 2024 deadline, Data Rights was supported by NLnet that became its fiscal sponsor. This means that NLnet has been acting as Data Rights' fiscal sponsor since the beginning of activities, and will do so until the end of the two years OSF grant.

As such, NLnet receives monthly updates from Data Rights.

[NLnet](#) is a recognised philanthropic non-profit foundation according to the Netherlands Tax Authority (Belastingdienst), registered with the Chamber of Commerce under number 41208365.

## Governance

The Board meets at least four times a year to oversee the Director's activities. Board members are subject to a strict conflict of interest policy and are elected unanimously for a 3-year term, renewable once only. The aim is for the Board to be renewed frequently and gradually. Serving as Chairman gives the possibility of an additional term, i.e. up to 9 years in total in the Board.

Major decisions are taken by vote at Board meetings. The Board is also responsible for the financial and strategic control of the organisation. The NLnet foundation, as fiscal sponsor for Data Rights's first two years, also participates in the control for the first two years of Data Rights' activity.

Board members are selected for their expertise (legal, data protection, technical, financial and political), their experience in positions of responsibility in European and international non-profit organisations, and their nationality. This last point is important for Data Rights, in order to ensure that various nationalities of the European Union are represented, both in terms of their importance and their fragility. The members of the Board are of Estonian, Romanian and German origin.

## Board Members

One of the core goals of Data Rights in its first years of existence is to grow its board.

- Polina Malaja (Estonia), Chair of the Board and general secretary
- Alexandra Godoï (Romanian), Treasury
- Kai Dittmann (Germany)
- Benjamin Fischer (Germany)

# Activity Report

Between the start of the Director's contract (20/03/2024) and the end of 2024, Data Rights' operations were focused on infrastructure, financial accountability and programmatic building blocks.

## 1 Infrastructure

One of the first missions of the Director was to rebuild the website on its entirety, to ensure that it could become an up-to-date dynamic window into the organisation's work. The company chosen to support the website is Odoo, a Belgian company built on open source and promoting the empowerment of users.

## 2 Financial Accountability

The establishment of Data Rights' financial accountability is a central requirement of OSF's core funding grant (contracted through NLnet) to launch the organisation.

After consulting with French and German accounting firms, as well as specialised attorneys, there were still doubts regarding where accounts had to be done. In the end French non-profit authorities found that accounts are required to be done in France. Accounts have been done externally, by a French firm ("cabinet expert comptable"), Yzico.

Data Rights' Board has decided to get the accounts audited.

### Balance sheet for the 2024 accounts

<b>Total du bilan</b>	<b>15 665,94</b>	<b>€</b>
<b>Chiffre d'affaires</b>	<b>689,29</b>	<b>€</b>
<b>Résultat net comptable</b>	<b>735,09</b>	<b>€</b>

Fait à HAGUENAU,  
Le 31/07/2025.

Marc SCHNELL,  
Expert-comptable.

Translation

- Total du bilan: Balance sheet total

- Chiffre d'affaire: Revenue
- Résultat net comptable: Net accounting result

The accounts were approved by the Treasurer and the Chair of Trustees on August 23, 2025 and signed on their behalf by Alexandra Godoï, Treasurer and Board Member.

### Details regarding the accounts

The accounts are even. That said it is noteworthy that some costs incurred were taken for longer than 12 months, like our website support, and the entire rebuilding of the website from the ground up cost around 6 000 € and is meant to be a one off cost. On the other side, as the organisation is establishing itself, some costs tied to its functioning could only be set up after the end of 2024. It was the case for accountants. It will also be the case for payroll, as the Director focussed first on the setting up of accounts management. Last but not least, employment taxes will need to be paid. The OSF budget was established to cover all these costs.

In addition, NLnet is the fiscal sponsor of Data Rights for its first two years of activity, that is to say, until April 2026. In practice this means that NLnet receives monthly updates from Data Rights, asks questions on specific details and receives reporting on progress towards the goals agreed with OSF.

## 3 Programmatic Building Blocks

An important goal of OSF to get the organisation started on the right track was to ensure Data Rights would hire a consultant to perform a deep dive into organisational development strategies. This work stream has helped specify the mission and ambitions of Data Rights. Most importantly, it led to the specification of the programmatic priorities for the following two years. The two programmes Data Rights will primarily invest work into will be:

- Dual Use Technology Regulation programme, with a start on spyware; and
- Digital Empowerment Economy, with a focus on the Silos Breaker project

Work on **dual-use technologies** began following an invitation from Spanish organisation Irídia and the Hungarian Civil Liberties Union (HCLU) to collaborate. The aim was to help unify civil society in pushing back against the abuse of spyware through legal means. Data Rights began working closely with these two leading national non-profits involved in spyware litigation within the EU, in order to bring together organisations of countries previously investigated by the European Parliament due to their governments' deployment of spyware against citizens.

The coalition was formed to encourage collaboration across existing legal cases, develop joint interventions, identify new strategic litigation opportunities, and pool resources effectively. During the coalition's retreat in December, Data Rights expressed its intention to work on

shaping public narratives, aiming to reach targetted audiences with a technology neutral message focused on dual-use technologies.

This approach reflects Data Rights' long-term objective: building a proactive civil society strategy that avoids being purely reactive to state or industry developments. Often, civil society organisations are forced to respond to events with limited access to the necessary facts, struggling to remain relevant in rapidly evolving contexts. This initiative seeks to shift that dynamic by fostering coordination, foresight, and a shared agenda across borders.

On the other hand, initial work on **Silos Breaker** focused on mapping the ecosystem and building trust with key actors, while identifying gaps on the user needs to attain fluid data mobility. These insights have directly informed the refinement of Data Rights' programme offering, ensuring it is better aligned with the needs of the field.

Aside of early programmatic actions, Data Rights was contracted by Privacy International to conduct a research backgrounder on France. Research focussed on the intersection of violations of the right to access to justice for individuals exercising their right to protest. This work was included in the [Protest Surveillance into Courts](#) report and infused parts of Data Rights' first conference at the congress of Germany's Chaos Computer Club. This congress being Europe's largest cybersecurity event, it provided considerable exposure for the organisation.

## Multi-Year Rights and Obligations

The core grant of OSF, contracted through the intermediary of our fiscal sponsor NLnet, runs from 20/03/2024 until 20/03/2026. The total amount of this grant is 210 000 \$, with 5% of the amount given to NLnet for their support.

The grant with the Digital Freedom Fund (DFF) for 28 000 € started on 04/09/2024 and is open ended, since it is tied to the future support of the case of Mr Van der Linde while he seeks Europol's accountability. This case, initiated prior to 2024, stands as a flagship example at the European level of the challenges faced by citizens who exercise their right to peaceful protest. Indeed, law enforcement often collect information about them and seeking accountability can be an odyssey. Mr Van der Linde started after the European Data Protection Supervisor (EDPS)—the data protection authority for EU institutions—determined that Europol had misrepresented its processing of his personal data. Data Rights' support for this grant covers accounting, advocacy, legal advice regarding the interpretation of the behaviour of Europol from a data protection law perspective and the review of the Court of Justice of the EU's brief drafted by the Dutch law firm Prakken d'Oliveira. Further details can be found on Data Rights' website under the Defend the Defenders programme. The case has also been extensively reported on by Statewatch.



Data Rights is a non-profit organisation that defends, enforces, and advances the rights of users, organisations and communities, to control their data.

<https://datarights.ngo>