

Activity Report

2025

Date: 07-2026

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

Table of Contents

Preliminary Information.....	3
Governance.....	4
Activity Report.....	5
1 Infrastructure.....	5
2 Financial Accountability.....	5
3 Programmes.....	5
Multi-Year Rights and Obligations.....	7

Preliminary Information

This activity report documents the second year of activity of Data Rights since employing workforce.

2025 has been a challenging year for non-profit sector and the world, with the return of Mr. Trump in the White House. Philanthropic donors and Foundations have slowed grants to strategise, or focus on existing grantees. Many, if not most, of our partners have had to shrink.

This year has seen the beginning of Data Rights' 'business-as-usual' programmatic activities on the dual use technology regulation programme, while fundraising and planning has taken place on the data mobility angle of the digital empowerment programme.

Governance

The Board meets at least four times a year to oversee the operational 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 Chairperson 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, fundraising, policy, 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 geographic variety. 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), Tresury
- Kai Dittmann (Germany)
- Benjamin Fischer (Germany)

Activity Report

In 2025 Data Rights' operations were focused on financial accountability, commencing programmatic actions and fundraising.

1 Financial Accountability

Accounts & Bookkeeping

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

At the time of writing this report all tax payments are up-to-date.

Due to a slow registration (see 2024 activity report), registrations with tax offices were made in September 2025, and payments were processed by authorities starting from 2026. Instead of leaving all taxes to appear on the 2026 accounts we agreed with our accounting firm's recommendation to virtually count taxes of 2024 and 2025 on the 2025 accounts. Otherwise 2026's accounts would have appeared dramatically unstable compared to 2024 and 2025.

For this reason the 2025 accounts virtually closed with a negative result, despite money for all taxes being already waiting on the bank account. More specifically, the sum of money received and paid in 2025 (including taxes virtually counted as paid), leaves a financial year closing at around – 7 000 euros. In practice this is due to the 35 000 euros of taxes for 2024 having been added to the year 2025.

Please find below the summary of 2025 accounts, as provided by the accounting firm's report:

DATA RIGHTS FRANCE**Pour l'exercice du 01/01/2025 au 31/12/2025**

Et conformément aux termes de notre lettre de mission, nous avons effectué les diligences prévues par la norme professionnelle du Conseil National de l'Ordre des Experts-Comptables applicable à la mission de présentation des comptes qui ne constitue ni un audit ni un examen limité.

Sur la base de nos travaux, nous n'avons pas relevé d'éléments remettant en cause la cohérence et la vraisemblance des comptes annuels pris dans leur ensemble.

Ces comptes annuels sont joints à la présente attestation, ils sont paginés conformément au sommaire figurant en tête du présent document, ils se caractérisent par les données suivantes :

Total du bilan	84 456,48 €
Total ressources	127 207,34 €
Résultat net comptable	-7 172,30 €

Details on legal entities mentioned above:

- Data Rights' accounting firm ('cabinet d'expertise comptable'), Yzico, SIREN n°790 659 098;

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

Financial audit

The accounts were reviewed and validated by the auditing firm Quante, Société d'expertise comptable et de commissariat aux comptes, SIREN n° 877 805 101, 31 rue d'Amsterdam, 75008, Paris / 21 rue d'Algérie, 69001, Lyon

Conclusions of the audit of the 2025 accounts are below:

DATA RIGHTS FRANCE
Association déclarée sous le régime de la loi du 1er juillet 1901
et du décret du 16 Août 1901
Siège social : 63 CHEMIN DU GUIQUET,
73610 SAINT-ALBAN-DE-MONTBEL
RNA W732010735
SIRET 92771148100014

RAPPORT DU COMMISSAIRE AUX COMPTES
SUR LES COMPTES ANNUELS
Exercice clos le 31 décembre 2025

A l'assemblée générale de l'Association :

I. Opinion

En exécution de la mission qui nous a été confiée par votre assemblée générale, nous avons effectué l'audit des comptes annuels de l'association DATA RIGHTS FRANCE relatifs à l'exercice clos le 31 décembre 2025, tels qu'ils sont joints au présent rapport.

Nous certifions que les comptes annuels sont, au regard des règles et principes comptables français, réguliers et sincères et donnent une image fidèle du résultat des opérations de l'exercice écoulé ainsi que de la situation financière et du patrimoine de l'Association à la fin de cet exercice.

II. Fondement de l'opinion

Référentiel d'audit

Nous avons effectué notre audit selon les normes d'exercice professionnel applicables en France. Nous estimons que les éléments que nous avons collectés sont suffisants et appropriés pour fonder notre opinion.

Les responsabilités qui nous incombent en vertu de ces normes sont indiquées dans la partie « *Responsabilités du commissaire aux comptes relatives à l'audit des comptes annuels* » du présent rapport.

Indépendance

Nous avons réalisé notre mission d'audit dans le respect des règles d'indépendance prévues par le Code de commerce et par le Code de déontologie de la profession de commissaire aux comptes, sur la période du 1^{er} janvier 2025 à la date d'émission de notre rapport, et notamment nous n'avons pas fourni de services interdits par le code de déontologie de la profession de commissaire aux comptes.

Translation of the "Opinion" paragraphs:

Having executed the mission bestowed upon us by your General Assembly/Board, we have audited the annual accounts of the non-profit Data Rights France for the financial year ended on the 31st of December 2025, as attached to this report.

We certify that the balance sheet is, according to French accounting rules and principles, in order and sincere, and provides a truthful view of the results of the association's operations for the past financial year, as well as of its financial position and assets at the end of that financial year.

2 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 consultancy on organisational development. This work stream has helped specify the mission and ambitions of Data Rights in 2024. Most importantly, it led to the specification of the programmatic priorities for the following two years. The two programmes Data Rights invests work are:

- The Dual-Use Technology Regulation programme; and
- The Digital Empowerment Economy programme.

In 2025, the Trump presidency started and led multiple funders to halt openings for new grantors. The organisational development consultancy was primarily focussed towards seeking general funding for the organisation. With months passing we decided to lower our expectations to raise unrestricted general funding and started focussing consultancy efforts towards data mobility activities tied to the Digital Empowerment Economy programme, while the Director was primarily focussing on the Dual-Use workstreams.

As part of the **Dual-Use Technology Regulation programme**, 2025 marked the beginning of formal operations. The year started with the intervention into the Brejza and others case while it reached the European Court of Human Rights (ECtHR). This case emanating from Poland is a strategic spyware case from two primary reasons. First, it is about law enforcement deploying the Pegasus spyware on lawyers and politicians for purely political reasons. Secondly, the Pegasus spyware was used to exfiltrate, among other data and targets, 10 years of texts from opposition leader Mr Brezja. The texts were later reorganised and merged to create a brand new narrative out of the original data, that was then sent to the general media and published on Polish TV as part of a political smear campaign.

In the summer 2025, the PEGA litigation coalition was formally launched, hosted in the EDRI offices and in the presence of former Member of the European Parliament Mme S. In 't Veld, who was the Rapporteur for the European Parliament's investigation into the use of spyware in the European Union (PEGA Committee). 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.

In the fall of 2025, Data Rights successfully raised money with the Spyware Accountability Initiative (SAI) to help coordinate the PEGA coalition, provide exposure to the coalition and focus on litigation strategies and plans. In December, legal research commenced, with the

agreement of high profile international law firm to review research once it would be finalised. (This support was later withdrawn due to conflicts of interest of the said law firm, sadly.)

In November 2025, Data Rights was invited to [speak at the European Parliament](#) about the use of spyware on journalists and share our analysis of the first legislative initiative of the European Union to protect journalists, the European Media Freedom Act (EMFA).

In December 2025 Data Rights gave a [conference on spyware litigation in Europe](#) at the congress of Germany's Chaos Computer Club. The conference was watched by employees at Tor, Apple and the Citizen Lab, as well as national security researchers, providing us with considerable exposure.

Regarding our **Digital Empowerment Economy programme**, 2025 saw the start of work on the Silos Breaker project, a project to focus on interoperability and portability enforcement. Over the summer 2025 we started partnering with the Norwegian Consumer Council (NCC), to collaborate on digital markets enshittification assessments. In addition, [Data Rights fed into the EU Commission's consultation on the intersections of the GDPR and the DMA](#), while refining its fundraising material focussed on the project.

Aside of early programmatic actions, Data Rights:

- Provided light legal review support to the case of Mr Van der Linde while he sought the accountability of Europol on its data processing activities.
- Applied in the Fall of 2025 to join European Digital Rights (EDRi), the confederation of digital Rights organisations, with the support of Bits of Freedom, Access Now and Privacy International. We have been close to EDRi and many of its members for more than 10 years, we were honoured to formally join this community in February 2026.
- Committed to conducting information security research on the state of information security in organisations providing support to victims of Gender Based Violence (GBV), through a SUPERRR Lab mini grants.

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) started on 04/09/2024 and is open ended, since it is tied to the support of the case of Mr Van der Linde while he seeks Europol's accountability. Mr Van der Linde referred his case to the Court of Justice of the European Union in the fall of 2025, leading to the finalisation of most payments tied to the grant. The final, residual lump tied to the grant will be paid by DFF once the ruling of the court is published.

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. 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.

The grant signed in November 2025 with the Spyware Accountability Initiative (SAI) runs until December 2026.



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>