

## **Appendix: Context of Ads and Platforms in Each Country/Region**

### **ADS TRANSPARENCY ANALYSIS**

We developed a systematic analytical framework to compare the functionalities, policies, terms of use and transparency mechanisms of ad networks from four big tech companies, digital platforms and search engines operating in the Brazilian market: Meta, Google, Twitter/X and TikTok. Our framework largely builds upon [40] and [109], who argue that researchers are going through a time of low transparency and significant restrictions over data access imposed by online platforms and big tech companies. Based on the public documentation of each ad network, evidence found in journalistic reports and the existing academic literature, we present the responsibilities these ad networks delegate to advertisers, the permissions and restrictions of their targeting systems, their advertiser verification processes and the topics that can or cannot be promoted by advertisers.

In particular, we pay attention to whether or not digital advertising repositories are available and the possibility of carrying out systematic investigations based on the provided data. That is, we consider that it is not enough to simply display and present the content of the advertisements to users, but to allow for systematically collecting available data and performing analysis in depth. In the cases in which ad repositories are available, we analyze their limitations regarding their searchability affordances, data access and data quality. Ultimately we analyze if researchers, journalists and other external auditors have found evidence of these protocols being carried out inappropriately, especially regarding the distribution of suspicious and irregular advertising.

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# BRAZIL

## Overall evaluation of ads transparency

Meta provides the most comprehensive advertising repository among the major social media platforms and search engines, despite its limitations [65]. In our analysis, the company satisfactorily complied with four out of seven analyzed topics, in addition to providing access to general advertising, albeit with limitations. As the only entity offering minimal mechanisms for auditing advertisements circulated on its platforms in Brazil, most research on advertisements promoting misinformation, scams, and fraud is primarily based on Meta platforms [68,70,71]. Although Google’s advertising transparency tool presents a series of limitations in other aspects. Its advertisement repository only allows searches for advertisers, which hinders the identification of fraudulent and disinformation content, for example, requiring prior knowledge of the name registered by advertisers on the platform. On other platforms, conducting investigations with the same scientific rigor is, for all intents and purposes, unfeasible — at least in Brazil. The absence of auditing tools does not prevent malicious advertisers from operating on other platforms. To the contrary, it means that they cannot be easily identified in the same way, ensuring them greater freedom.

**Table 1: Comparison of transparency documentation and means of accessing data from advertising tools of digital platforms and search engines analyzed in Brazil.**

		Meta Ads	Google Ads	Twitter/X Ads	TikTok Ads
1	Does it present a searchable repository of general advertising?	Partially	No	No	No
2	Does it allow the systematic collection of data from general advertising?	Partially	No	No	No
3	Does it present consistent criteria for verifying advertisers?	Partially	Partially	No	Partially
4	Does it authorize the political, electoral, and/or sensitive use of its advertising tool?	Yes	Yes	Partially	No
5	Does it present a searchable repository of political, electoral, and/or sensitive advertising?	Yes	No	No	No
6	Is the enforcement of ads policies and categorization consistent?	No	No	No	No

## Meta Ads

1. Although Meta provides a repository of general advertising that circulates on its platforms and which is searchable by keywords and advertisers of interest in Brazil, it is only possible to search for ads while they are being served to users ([Meta Ad Library, n.d.a](#)). While political, electoral and sensitive ads are archived for seven years, there is no possibility of retrieving or viewing historical general advertising data.
2. Meta only allows for the systematic collection of political, electoral and sensitive ads data through its user interface or API ([Meta Ad Library, n.d.b](#)). However, researchers and other interested parties can manually check for active general ads and manually retrieve or scrape their data.
3. In general, advertisers on Meta do not need to go through any rigorous identity verification process and must only present a valid payment method to serve ads ([Andreou et al., 2019](#)). Verification of advertisers is only necessary for all profiles that want to run ads on social issues, politics and/or elections ([Meta, n.d.a; n.d.b](#)) or some other businesses who may want to access some specific tools and technologies ([Meta, n.d.c](#)).
4. Meta ([n.d.d](#)) allows the serving of ads about social issues, elections or politics, defined as those: i) “made by, on behalf of, or about a candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office”; ii) “about any election, referendum, or ballot initiative, including “go out and vote” or election campaigns”; or iii) “about social issues in any place where the ad is being placed”.
5. In Brazil, ads about social issues, elections or politics are stored for up to seven years in Meta Ad Library, through which they are searchable by keywords and advertisers of interest, and can have their metadata collected systematically through its user interface or API ([Meta Ad Library, n.d.a; n.d.b](#)).
6. Currently, the categorization of an ad as referring to social, electoral or political themes in Meta is up to the advertisers themselves, which is often wrong due to negligence or a lack of clearly defined criteria ([Le Pochat et al., 2022](#)). Once an ad is served, this labeling may be altered by Meta in a process that merges human curation with Artificial Intelligence ([Meta Transparency Center, 2024](#)), but the scope of these review actions is unclear. Researchers have also demonstrated that the Meta ads network is frequently explored by scammers and other deceptive actors in order to morally and financially harm consumers in Brazil ([Santini et al., 2024](#)).

## Google Ads

1. Although Google presents a public repository of all ads served on its ad network, it is only possible to search for advertisers through it, thus the interested user must know in advance the names under which advertisers have registered ([Google Ads Transparency Report, n.d.](#)). Searching for specific terms is not permitted, which substantially impairs navigation through the company’s advertising universe. No list of advertisers advertising on Google platforms is made public.

2. Google does not allow the systematic collection of data from general ads served on its ad network, only from political or election ads. Although users can try to scrape data from these ads or record them manually from its repository, it is impossible to consistently navigate the universe of ads under the company's responsibility, as it is not possible to browse sponsored content by using search terms and no list of advertisers is made public.
3. Google states that all of its advertisers will have to complete identity verification processes at some point to shield consumers from possible misleading, abusive and fraudulent advertisements ([Google, n.d.a](#); [Google, n.d.b](#)) and all electoral ads must be served by verified advertisers in Brazil ([REF](#)). It also offers certification programs so that advertisers from specific sectors, such as health, entertainment and gambling, comply with good practices ([Google, n.d.a](#)). However, the company states that there are occasions when "advertisers may continue to serve ads even if they have not started or completed the verification process or if they have not met all of its requirements" ([Google, n.d.b](#)).
4. Google allows the serving of political and electoral ads, but does not strictly distinguish between them. In Brazil, Google directly defines only electoral ads: in Brazil, they are those sponsored by "a political party, a coalition, a federation, the holder of a currently elected office or a candidate for the Presidency, the Vice-Presidency, the Federal Senate or the Chamber of Deputies" or "a political party, a coalition, a federation, the holder of a currently elected position or a candidate for Governor, Vice-Governor, State Legislative Assemblies or the Legislative Chamber of the Federal District" ([Google Ads Policies Help, n.d.](#)).
5. Although Google presents a public repository of ads labeled as political and electoral served on its ad network, it is only possible to search for advertisers through it, thus the interested user must know in advance the names under which advertisers have registered ([Google Ads Transparency Report, n.d.](#)). Searching for specific terms is not permitted, which substantially impairs navigation through the company's advertising universe.
6. Recent reports have shown that the Google ad network has been exploited by several Brazilian criminal organizations so that scammer websites can be boosted and achieve a good position in the results of their search engine ([Teixeira, 2023](#)).

#### Twitter/X Ads

1. The Twitter/X advertising repository is not available in Brazil, only in the European Union ([Twitter/X Ads Repository, n.d.](#)).
2. Although its users may attempt to scrape data from ads served on it, Twitter/X does not allow the development of crawlers and scrapers in its terms of use ([Twitter/X Help Center, 2017](#)) and does not present any measures for collecting data relating to its general advertising.
3. In its documentation, Twitter/X does not present strict advertiser verification protocols. Individuals verified through the Twitter Blue/X Premium modality, which requires a monthly payment to display a badge on profiles and allows access to specific features, can advertise without any major problems ([Twitter/X, n.d.a](#)). For this verification, the

platform requires the user to have their account created more than 30 days ago, to have a valid cell phone number and to send personal documents ([Twitter/X, n.d.b](#)). However, journalists report that the platform has been taken over by fake accounts that have passed verification processes ([Paul, 2023](#); [Tolentino, 2023](#)). Non-governmental organizations, government and state institutions and various companies can advertise as long as they have gone through the specific verification process for this segment, which also requires recurring payments ([Twitter/X, n.d.c](#)).

4. Twitter/X distinguishes between what it calls “political content ads” and “political campaigning ads.” In its definition, the first would be those that “reference a candidate, political party, elected or appointed government official, election, referendum, ballot measure, legislation, regulation, directive, or judicial outcome” ([Twitter/X, n.d.d](#)). Political campaign ads are those “that advocate for or against, appeal directly for votes, or solicit financial support for a candidate or political party [OR] an election, legislation, referendum, or ballot measure.” ([Twitter/X, n.d.d](#)). Only political content ads are allowed in Brazil.
5. The Twitter/X advertising repository is only available in the European Union due to the Digital Services Act ([Twitter Ads Repository, n.d.](#)).
6. Although the Twitter/X’s ads policies state that ads “must not promote products or services using deceptive marketing or misrepresentative business practices”, Twitter/X has already refused to remove ads that promoted financial fraud through the misuse of images of Brazilian celebrities by suspicious profiles verified in the Premium/Blue modality, which has led them to take legal actions against the platform ([Estadão, 2023](#)).

### **TikTok Ads**

1. The TikTok Commercial Content only allows for the retrieval of ads that were served to users in the European Economic Area (EEA), Switzerland, and the UK due to the Digital Services Act ([TikTok, n.d.a](#)).
2. In Brazil, TikTok ad data extraction is restricted to scraping attempts, as there is no public repository or any other advertising transparency measures. We emphasize that the development of data scrapers violates the platform’s terms of use ([TikTok, 2020](#)).
3. Before, only advertisers who resided or operated in one of 32 selected European countries needed to complete verification processes in order to advertise on TikTok. Currently, the company states that it “will encourage advertisers to submit a business verification document for review” ([TikTok, n.d.b](#)), including in Brazil ([TikTok, n.d.c](#)). However, it does not specify the scope and reach of these verification reviews.
4. TikTok does not allow political and issue-based advertising on its platform and prohibits “candidates or nominees for public office, political parties, and elected or appointed government officials” and “spouses of candidates, elected, or appointed government officials with official duties or offices” of sponsoring content ([TikTok, n.d.d](#)). However, government entities can advertise on the platform if they are granted a special authorization to do so.
5. The TikTok Commercial Content is only available to users in the European Economic Area (EEA), Switzerland, and the UK due to the Digital Services Act ([TikTok, n.d.a](#)).

6. Although the platform claims to prohibit the broadcasting of political and electoral advertisements worldwide, researchers have already found ads in support of Brazilian candidates broadcast in European territories while exploring the TikTok Commercial Content Library ([Campos Mello, 2023](#)).

## THAILAND

### **Context of ads and platforms on country/region**

Thailand has the highest degree of Facebook connectivity in Southeast Asia with Bangkok dubbed the “capital of Facebook” ([REF](#)). Thailand’s social network users have grown steadily, from 60 percent in 2017 to 80 percent in 2023 out of 71 million population ([REF](#)). In 2023, Facebook and Line (Japan-based chat application), followed closely by TikTok, were the most used social media platforms, with a penetration rate per population of 91, 90, and 78.2 percent, respectively ([REF](#)). As the primary platform for digital mobilization by the youngsters in 2020, Twitter is only the sixth most used application in Thailand, with a penetration rate of 51 percent.

Social media ads represent one of the fastest growing and most lucrative industries in the country, primarily characterized by influencer marketing through short-form videos. In 2020, ads expenditures of Facebook, YouTube, and LINE in the country were USD 209.4 million ([REF](#)), USD 149 million, and USD 36 million respectively ([REF](#)). After the May 2023 election, Thailand’s economy showed signs of recovery, with digital ads spending growing 14 percent to 29.2 billion THB (80 million USD ). Of this, the value of ads on Meta-owned Facebook and Instagram held a dominant share at 30 percent, while Google-owned YouTube accounted for a 15 percent share. Spending on Tiktok ads grew by 44 percent, comprising a 10 percent share, up from the sixth to third place in 2023 ([REF](#)).

### **Overall evaluation of ads transparency**

Despite its limitations, Meta provides the most comprehensive advertising repository compared to other major social media platforms included in this study. The company met with all five requirements, albeit in a varying degree. Specifically, Meta is the only platform that offers a tool for auditing both general and political ads even if researchers would need prior knowledge to manually search for ads entities’ names and websites. In contrast, Google allows a search for general ads of verified accounts in Thailand. However, despite the prevalence of political and electoral content on YouTube, Thailand is not a part of “supported regions”; no access to political ads is provided. Twitter arguably performs the worst when it comes to ads data transparency. Following Elon Musk’s ascendance as the platform’s CEO, Twitter started to allow the advertisement of political content, while stripping academic and civil society’s access to its auditing tool. This is particularly the case for communities outside the US and European Union. On the surface, TikTok seems to be committed to information integrity and users’ safety. But, similar to Twitter, due to the enforcement of DSA, it only allows researchers in the European Economic Area (EEA), Switzerland, and the UK to access its database on commercial content. These observations from the Thai case bring to light ads transparency discrepancy between countries the global north and the global south. The latter’s regulatory regimes and

enforcement capacities are weaker than the former despite being Big Tech's major sources of user data and advertisement profits.

**Table 2: Comparison of transparency documentation and means of accessing data from advertising tools of digital platforms and search engines analyzed in Thailand**

		Meta Ads	Google Ads	Twitter/X Ads	TikTok Ads
1	Does it present a searchable repository of general advertising?	Partially	No	No	No
2	Does it allow the systematic collection of data from general advertising?	Partially	Partially	No	No
3	Does it present consistent criteria for verifying advertisers?	Yes	Yes	No	No
4	Does it authorize the political, electoral, and/or sensitive use of its advertising tool?	Yes	No	Yes	Partially
5	Does it present a searchable repository of political, electoral, and/or sensitive advertising?	Yes	No	No	No
6	Is the enforcement of ads policies and categorization consistent?	Partially	Partially	No	Partially

#### Meta Ads

1. Meta provides a repository of general advertising that circulates on its platforms and which is searchable by keywords and advertisers of interest in Thailand. But similar to Brazil, it is only possible to search for ads while they are being served to users ([Meta Ad Library, n.d.a](#)). Political, electoral and sensitive ads are so far archived for two years. It is no possible to retrieve or view historical general advertising data.
2. Concurrent with a predominating trend in Brazil, Meta only allows for the systematic collection of political, electoral and sensitive ads data through its user interface or API ([Meta Ad Library, n.d.b](#)). However, researchers and other interested parties can manually check for active general ads and manually retrieve or scrape their data. Moreover, in Thailand, critical information such as estimated audience size that a political ad reaches is not consistently available.
3. In response to government pressure in August 2023 (see no. 5), Meta currently compels advertisers to go through an authorization process using government-issued photo ID and include "Paid for by" disclaimers on their ads so that the people in Thailand could see who was funding the ads and attempting to influence them ([REF](#)).
4. Similar to Brazil, Meta allows the serving of ads about social issues, elections or politics. But the definitions of these notions remain vague, lacking contextualized details.

5. In Thailand, ads about social issues, elections or politics are archived from 2022 on (so far two years) in Meta Ad Library, through which they are searchable by keywords and advertisers of interest, and can have their metadata collected systematically through its user interface or API ([Meta Ad Library, n.d.a; n.d.b](#)).
6. Currently, the categorization of an ad as social, electoral or political themes in Meta is up to the advertisers themselves, which makes the scope of interpretation broad and subjective ([Le Pochat et al., 2022](#)). Despite this labeling possibly altered by Meta in a process that merges human curation with Artificial Intelligence ([Meta Transparency Center, 2024](#)), how these reviews are carried out is unclear. One study shows that Meta's political ad and policy enforcement often misses detecting political ads run by politicians and political parties. This means malicious advertisers can run political ad campaigns without getting spotted ([REF](#)). This is the case in Thailand where political accounts have advertised disinformation and conspiracy theories ([REF](#)). In addition, scammers, disguised as financial and investment advisers offering high profits, have lured people into scams in which they lose their money. While the Thai government, in August 2023, threatened Facebook with legal action, that platform has been slow in enforcing consumer protection measures ([REF](#)).

### Google Ads

1. Despite its public repository of all ads served on its ad network, Google's Ads Transparency Center only allows search for names or website names of verified advertisers ([Google Ads Transparency Report, n.d.](#)). In Thai context, a large number of YouTube accounts, including legend media, are yet to be verified; no ads information about these accounts are available. Google's political ads repository is only available in some countries, but not Thailand.
2. Google does not allow the systematic collection of data from general ads served on its ad network, only from political or election ads. It is difficult to consistently navigate the extensive database of ads without prior knowledge of the advertisers' names or websites. Further, Thailand is not included the database for political ads (see no. 4); it is impossible to collect this data.
3. Following the COVID-19 onset in 2020 ([REF](#)), Google enforced a verification process for organizations and individuals in Thailand. Organizations that want to serve ads on its site are required to submit; (1) organization registration documents and; (2) a government-issued photo ID from an authorized representative (e.g., passport or national ID card). An authorized representative has to be an admin of the Google Ads account and/or the payments profile paying for the ads. Meanwhile, individuals are to submit only the government-issued photo ID ([REF](#)). The government-issued photo ID can be issued in any country. However, it is unclear how Google verify the authenticity of these documents. Some advertisers deemed as potentially misleading and engaging in cross-geo targeting may be selected to complete a verification process clear. However, even if these advertisers did not initiate or complete the verification or if they had failed to meet the requirements of the verification program, Google still allows advertisers to continue running ads ([REF](#)).

4. Compared to its Southeast Asian neighbors such as Indonesia ([REF](#)), Thailand does not restrict political ads on YouTube/Google. The information about how the platform regulates election ads in Thailand is extremely scant despite the prevalence of political party accounts on YouTube.
5. Google's "political advertising" database covers only 11 countries, including Australia, India, and Brazil, and the European Union possibly because of the existing regulations of political and/or election ads in these countries ([REF](#)). Thailand is, however, not included in this database despite its Election Commission's regulation of online campaign financing during the May 2023 election ([REF](#)).
6. Google outlines how ads that violate its Ads policies (e.g. misleading and fund soliciting) can lead an account to be paused. Further, advertisers are required to comply with the local laws and regulations of any area their ads target, in addition to the standard Google Ads policies. As local laws in autocratic countries like Thailand can be draconian and arbitrary, inducing censorship, it is unclear where Google stands when the local laws clash with international human rights standards, including the protection of freedom of expression vis-a-vis political ads ([REF](#)).

### Twitter/X Ads

1. As with Brazil, the Twitter/X advertising repository is not available in Thailand ([Twitter/X Ads Repository, n.d.](#)). It is only available in the European Union member countries, but the database is archived only from 26 August 2023 onward.
2. In general, Twitter/X does not allow access to its ads data by crawlers and scrapers in its terms of use ([Twitter/X Help Center, 2017](#)). For researchers, the platform does not have clear guidelines on how to identify ads or provide clear identification suggesting if an ad was paid for or not in their platform. This hampers at-scale analysis of its advertising ecosystem ([REF](#)).
3. In its documentation, Twitter/X does not present strict advertiser verification protocols. Individuals verified through the Twitter Blue/X Premium modality, which requires a monthly payment to display a badge on profiles and allows access to specific features, can advertise without any major problems ([Twitter/X, n.d.a](#)). For this verification, the platform requires the user to have their account created more than 30 days ago, to have a valid cell phone number and to send personal documents ([Twitter/X, n.d.b](#)). However, journalists report that the platform has been taken over by fake accounts that have passed verification processes ([Paul, 2023](#); [Tolentino, 2023](#)). Non-governmental organizations, government and state institutions and various companies can advertise as long as they have gone through the specific verification process for this segment, which also requires recurring payments ([Twitter/X, n.d.c](#)).
4. Twitter/X distinguishes between what it calls "political content ads" and "political campaigning ads." In its definition, the first would be those that "reference a candidate, political party, elected or appointed government official, election, referendum, ballot measure, legislation, regulation, directive, or judicial outcome" ([Twitter/X, n.d.d](#)). Political campaign ads are those "that advocate for or against, appeal directly for votes, or solicit financial support for a candidate or political party [OR] an election, legislation, referendum, or ballot measure." ([Twitter/X, n.d.d](#)). While in 2019 political content ads were globally banned ([REF](#)), in August 2023, Elon Musk who took over Twitter

since 2022 reversed the ban in the US ([REF](#)). This has had detrimental impact in Thailand. In 2020, Twitter actively suspended the Thai military- and monarchy-related accounts with coordinated behaviors ([REF](#)). After Twitter's organizational and policy changes, there is little report about suspension of malicious political accounts in Thailand.

5. The Twitter/X advertising repository is not available in Thailand. In Thailand.
6. Recently, Twitter has inactively enforced ads policy. Of more than 60 percent of political ads reportedly violating the platform's political content policy ([REF](#)), only 3.7 percent were removed by the platform within two weeks. In Thailand, the enforcement of ads policy has been inconsistent, with some users reporting their accounts to be banned despite claims of no violation.

### **TikTok Ads**

1. The TikTok Commercial Content only allows for the retrieval of ads that were served to users in the European Economic Area (EEA), Switzerland, and the UK due to the Digital Services Act ([TikTok, n.d.a](#)).
2. As of this writing, Tiktok only provides "Research API" for researchers from non-profit universities only in the US and Europe. Despite its offer of increased access to the Research API in the future ([REF](#)), as of this writing, TikTok ad data extraction in Thailand is limited to scraping attempts. These violate the platform's terms of use ([TikTok, 2020](#)).
3. Only advertisers who reside or operate in one of 32 selected European countries need to be verified ([TikTok, n.d.b](#)). As such, it is not mandatory for advertisers in Thailand to verify their accounts although Tiktok encourages "advertisers to submit a business verification document for review" ([TikTok, n.d.b](#)). Tiktok's Business Help Center provides some information regarding required documents and a review process, but unlike Meta and Google, there is no specific scope of the review.
4. TikTok does not allow any form of political content, both brands and paid branded content. As a result, "candidates or nominees for public office, political parties, and elected or appointed government officials" and "spouses of candidates, elected, or appointed government officials with official duties or offices", are prohibited from sponsoring content. In addition, the platform states that creators or influencers paid to produce political content are deemed violating its rules and risk having action taken against their accounts ([TikTok, n.d.d](#)). The Thai transparency page of TikTok provides detailed explanation that, while government-affiliated media and agency accounts are allowed to operate on the platform, their content are officially labeled as "under the government's editorial control or influence" ([REF](#)).
5. The Thai transparency page of TikTok details its commitment to fighting electoral disinformation and influence operations through collaboration with local civil societies. Despite this statement, Thai researchers and watchdog organizations cannot access TikTok Commercial Content and take the platform to account as the database is only available to users in the European Economic Area (EEA), Switzerland, and the UK due to the Digital Services Act ([TikTok, n.d.a](#)).

- Despite the platform’s claims to prohibit the advertising of all forms of political content, the 2023 general election in Thailand saw the rise of “political influencers” suspected to infuse political into their commercial content ([BEE](#)). There is no available information whether they are paid and if so, whether TikTok Thailand has taken action against these accounts.

## USA

**Table 3: Comparison of transparency documentation and means of accessing data from advertising tools of digital platforms and search engines analyzed in the USA**

		Meta Ads	Google Ads	Twitter/X Ads	TikTok Ads
1	Does it present a searchable repository of general advertising?	Partially	No	No	No
2	Does it allow the systematic collection of data from general advertising?	Partially	No	No	No
3	Does it present consistent criteria for verifying advertisers?	Partially	Partially	No	Partially
4	Does it authorize the political, electoral, and/or sensitive use of its advertising tool?	Yes	Yes	Yes	No
5	Does it present a searchable repository of political, electoral, and/or sensitive advertising?	Yes	No	No	No
6	Is the enforcement of ads policies and categorization consistent?	No	No	No	No

### Meta Ads

- As happens in Brazil, although Meta provides a repository of general advertising that circulates on its platforms and which is searchable by keywords and advertisers of interest, it is only possible to search for ads while they are being served to users ([Meta Ad Library, n.d.a](#)). While political, electoral and sensitive ads are archived for seven years, there is no possibility of retrieving or viewing historical general advertising data. The main difference is that the Meta Ad Library in the US also allows browsing general ads that are still being served by different categories: Housing, Employment and Credit.
- Researchers and other interested parties in the US also cannot collect general ads data systematically through Meta Ad Library user interface or API, only political electoral and sensitive ads data ([Meta Ad Library, n.d.b](#)). However, researchers and other interested parties can manually check for active general ads and manually retrieve or scrape their data.
- In general, advertisers on Meta do not need to go through any rigorous identity verification process and must only present a valid payment method to serve ads ([Andreou et al., 2019](#)). Verification of advertisers is only necessary for

all profiles that want to run ads on social issues, politics and/or elections, housing, credit and employment ([Meta, n.d.a; n.d.b](#)) or some other businesses who may want to access some specific tools and technologies ([Meta, n.d.c](#)).

4. Meta ([REF](#)) allows the serving of ads about social issues, elections or politics, defined as those: i) “made by, on behalf of, or about a candidate for public office, a political figure, a political party, a political action committee or advocates for the outcome of an election to public office”; ii) “about any election, referendum, or ballot initiative, including “go out and vote” or election campaigns”; or iii) “about social issues in any place where the ad is being placed”.
5. Ads about social issues, elections or politics are stored for up to seven years in Meta Ad Library, through which they are searchable by keywords and advertisers of interest, and can have their metadata collected systematically through its user interface or API ([Meta Ad Library, n.d.a; n.d.b](#)).
6. Currently, the categorization of an ad as referring to social, electoral or political themes in Meta is up to the advertisers themselves, which is often wrong due to negligence or a lack of clearly defined criteria ([Le Pochat et al., 2022](#)). Once an ad is served, this labeling may be altered by Meta in a process that merges human curation with Artificial Intelligence ([Meta Transparency Center, 2024](#)), but the scope of these review actions is unclear. However, a study carried out in the US found that nearly 55% of political ads served on Meta platforms are not correctly labeled ([Le Pochat et al., 2022](#)).

## Google Ads

1. Although Google presents a public repository of all ads served on its ad network, it is only possible to search for advertisers through it, thus the interested user must know in advance the names under which advertisers have registered ([Google Ads Transparency Report, n.d.](#)). Searching for specific terms is not permitted, which substantially impairs navigation through the company’s advertising universe. No list of advertisers advertising on Google platforms is made public.
2. Google does not allow the systematic collection of data from general ads served on its ad network, only from political or election ads. Although users can try to scrape data from these ads or record them manually from its repository, it is impossible to consistently navigate the universe of ads under the company’s responsibility, as it is not possible to browse sponsored content by using search terms and no list of advertisers is made public.
3. Google states that all of its advertisers will have to complete identity verification processes at some point to shield consumers from possible misleading, abusive and fraudulent advertisements ([Google, n.d.a; Google, n.d.b](#)) and all electoral ads must be served by verified advertisers in the US ([REF](#)). It also offers certification programs so that advertisers from specific sectors, such as health, entertainment and gambling, comply with good practices ([Google, n.d.a](#)). However, the company states that there are occasions when “advertisers may continue to serve ads even if they have not started or completed the verification process or if they have not met all of its requirements” ([Google, n.d.b](#)) and several advertisers remain unverified ([REF](#)).

4. Google allows the serving of political and electoral ads, but does not strictly distinguish between them. Electoral ads are those that feature “a current officeholder or candidate for an elected federal office. This includes federal offices such as that of the President or Vice President of the United States, members of the United States House of Representatives or United States Senate”, “a current officeholder or candidate for a state-level elected office, such as Governor, Secretary of State, or member of a state legislature”, “a federal or state level political party” or “a state-level ballot measure, initiative, or proposition that has qualified for the ballot in its state” (REF).
5. Although Google presents a public repository of ads labeled as political and electoral served on its ad network, it is only possible to search for advertisers through it, thus the interested user must know in advance the names under which advertisers have registered (Google Ads Transparency Report, n.d.). Searching for specific terms is not permitted, which substantially impairs navigation through the company’s advertising universe. No list of advertisers advertising on Google platforms is made public.
6. Even though Google claims that “advertisers may not run personalized ads, make use of any third party trackers, or otherwise attempt to collect personal information from minors or on content set as made for kids” (REF), the US Federal Trade Commission is being demanded to investigate the company as they would be illegally allowing advertisers to target minor audiences (REF).

#### Twitter/X Ads

1. As with Brazil, the Twitter/X advertising repository is not available in the US, as it only allows for the retrieval of ads served for users in the European Union (Twitter/X Ads Repository, n.d.).
2. Twitter/X also does not provide any means to systematically collecting data from ads served in the US.
3. Twitter/X states that all users who subscribe to paid Twitter Blue/X Premium plans, which allow users to access specific tools and to show a specific badge in their profiles, are allowed to run ads on the platform (Twitter/X, n.d.a). For this verification, the platform requires the user to have their account created more than 30 days ago, to have a valid cell phone number and to send personal documents (Twitter/X, n.d.b). However, journalists report that the platform has been taken over by fake accounts that have passed verification processes (Paul, 2023; Tolentino, 2023). Non-governmental organizations, government and state institutions and various companies can advertise as long as they have gone through the specific verification process for this segment, which also requires recurring payments (Twitter/X, n.d.c).
4. Twitter/X distinguishes between what it calls “political content ads” and “political campaigning ads.” In its definition, the first would be those that “reference a candidate, political party, elected or appointed government official, election, referendum, ballot measure, legislation, regulation, directive, or judicial outcome” (Twitter/X, n.d.d). Political campaign ads are those “that advocate for or against, appeal directly for votes, or solicit financial support for a candidate or political party [OR] an election, legislation, referendum, or ballot measure.” (Twitter/X, n.d.d). Both types of ads may be served to US users. The company states that advertisers are prohibited from promoting false or

misleading political and electoral information, although it does not disclose if this is somehow enforced. Still according to them, any compliance with legislation regarding disclosure and content requirements is under the sole responsibility of the advertisers.

5. As with Brazil, the Twitter/X advertising repository does not present any data on ads served in the US ([Twitter/X Ads Repository, n.d.](#)). Nonetheless, users in the European Union cannot browse through political ads while using the tool.
6. As big and renowned advertisers are leaving Twitter/X since the company takeover by Elon Musk ([REF](#)), unverified scammers have been running ads on the platform. Most notoriously, cryptocurrency fraud ads, not rarely accompanied by a photo of Elon Musk, are being targeted to the platform's users by inauthentic advertisers ([REF](#); [REF](#)). Although the Twitter/X's ads policies state that ads "must not promote products or services using deceptive marketing or misrepresentative business practices", it also makes clear that the platform places all responsibility for the content of ads to the advertisers, claiming that "you are responsible for all your promoted content on X[, which] includes complying with applicable laws and regulations regarding advertisements" ([REF](#)).

#### **TikTok Ads**

1. The TikTok Commercial Content Library and API only allow for the retrieval of ads that were served to users in the European Economic Area (EEA), Switzerland, and the UK due to the Digital Services Act ([TikTok, n.d.a](#)).
2. The TikTok Commercial Content Library and API do not allow the collection of data related to ads served to US users and the platform does not offer any other means through which this is possible.
3. TikTok states that it will encourage advertisers to submit documents for a verification review process in order to "facilitate better transparency for users and support a trusted ads environment" ([REF](#)). Advertisers in the US may submit an Employer Identification Number or a D-U-N-S Registered Certificate for that matter ([REF](#)).
4. The platform's *Advertising Guidelines* state that political ads are not allowed to be served in any form on it ([REF](#)). Thus, "Candidates or nominees for public office, political parties, and elected or appointed government officials" and "The spouses of candidates, elected, or appointed government officials with official duties" from anywhere in the world are prohibited from advertising on TikTok ([REF](#)).
5. The TikTok Commercial Content Library and API do not present any data on ads served in the US ([REF](#)). Nonetheless, users in the EEA, Switzerland and the UK cannot browse through political ads while using the tool, as the platform does not recognise its use for political advertising.
6. The TikTok Advertising Policies affirm that the platform does not allow ads that contain "inaccurate, misleading, or false content that may cause significant harm to individuals or society, regardless of intent" ([REF](#)). Nonetheless, media reports claim that TikTok in the US is full of scammers that pretend to be real and renowned advertisers ([REF](#)). More recently, an American YouTube celebrity has also claimed that scammer ads served on the platform depict an "AI generated deepfake version of him" in order to promote false low-cost iPhone promotions ([REF](#)).

# IRELAND (EUROPEAN UNION)

## Context of ads and platforms on country/region

Ireland is home to the European Headquarters of Google, Meta, X/Twitter and TikTok and has played a significant role in shaping social media governance in Europe. Ireland's "[Coimisiún na Meán](#)" (Media Commission) is the competent authority responsible for regulating online media and as a member state of the European Union, the state's guidelines for digital advertisement governance are determined by the [Digital Services Act](#) (DSA; fully implemented 17 February 2024) and to a lesser extent, the [Digital Markets Act](#) (DMA; implemented March 2024). Viewed as landmark pieces of legislation to regulate Big Tech in Europe, the DSA [in particular] and DMA protect fundamental human rights and data privacy, essentially bringing "European values into the digital world" ([REF](#)). The DSA also commits to prevent the spread of online disinformation. While promoting European digital sovereignty represents a [strategic priority for the EU](#), the DSA and DMA are positioned to affect *global* norms of platform governance: both enact substantial pressure on Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs)/gatekeepers (i.e. 'Big Tech') to shift regulatory cultures and behavioral norms beyond the EU.

Though the DSA is now in force, the scale of its requirements has entailed a slow response on the part of some VLOPs. Despite evidence of delay tactics and obfuscation on the part of major platforms, one nevertheless sees a clear trend of 'proactive' moves by platforms to ensure general compliance. These include additional transparency reports, expansion of researcher access to ad libraries, the steady roll-out of chronological feeds on platforms and the option for users to 'opt-out' of algorithmically-determined recommendations and political ads. The strength of the DSA is not only upheld by the regulatory power of the EU more generally—and the clear need for large platforms to maintain access a market of over 450 million users—but also via stringent enforcement rules, which can entail a fines of up to 6% of platforms' global turnover in cases of non-compliance. In addition, the DMA may impose fines of up to 10% of global turnover in cases of non-compliance, with fines of up to 20% for repeat offenses ([REF](#)). With an added layer of (often overlapping) requirements, the Digital Markets Act should entail additional self-reporting on algorithms and ranking criteria, which would result in greater transparency in the EU for both general and political advertisements. In sum, the regulatory environment in the EU is one of flux and there are clear indications of a power struggle between European regulators and major platforms. Nonetheless, some early trends around (enforced) transparency in the realm of digital advertising (and beyond) suggests that regulation indeed possesses sufficient power to shift platform behavior towards enhanced transparency and meaningful change, in both the long and short-term.

## Overall evaluation of ads transparency

Of all the four regions, social media platforms offer more transparency, on the whole, and greater tools for researchers to evaluate their advertisement content and policies to those in the EU. There is little question that this more robust commitment to transparency comes as a result of significant regulatory pressure, coming from the DSA and DMA (see above). In this regard, one sees small shifts in accessibility and transparency declarations among Meta and Google—who had been a little more transparent than Twitter/X and Tik Tok in other regions, to the point of DSA enforcement. With the application of the DSA rules, one sees very basic attempts on behalf of X/Twitter and Tik Tok to make available their repositories for researchers and at that, meaningfully systematic research is made difficult. Researchers cannot search for ‘political’ content and the timeframe is limited to 1 year, in the case of X/Twitter, and only from 1 October in the case of Tik Tok: that is, the minimum timeframe under the terms of the DSA. At the time of writing, limitations are sufficiently apparent that, as of February 24, 2024, the European Commission has opened formal proceedings against TikTok, which will investigate “compliance with DSA obligations to provide a searchable and reliable repository for advertisements presented on TikTok” and “suspected shortcomings in giving researchers access to TikTok’s publicly accessible data as mandated by Article 40 of the DSA.

**Table 1: Comparison of transparency documentation and means of accessing data from advertising tools of digital platforms and search engines analyzed in Ireland**

		<b>Meta Ads</b>	<b>Google Ads</b>	<b>Twitter/X Ads</b>	<b>TikTok Ads</b>
<b>1</b>	<b>Does it present a searchable repository of general advertising?</b>	Partially	No	Yes	Yes
<b>2</b>	<b>Does it allow the systematic collection of data from general advertising?</b>	Partially	No	Partially	Partially
<b>3</b>	<b>Does it present consistent criteria for verifying advertisers?</b>	Partially	Partially	Partially	Partially
<b>4</b>	<b>Does it authorize the political, electoral, and/or sensitive use of its advertising tool?</b>	Yes	Yes	Yes	No
<b>5</b>	<b>Does it present a searchable repository of political, electoral, and/or sensitive advertising?</b>	Yes	No	No	No
<b>6</b>	<b>Is the enforcement of ads policies and categorization consistent?</b>	No	No	No	No

**Meta Ads**

1. Meta provides a repository of general advertising that circulates on its platforms, which is searchable by keywords and advertisers of interest in Ireland. It is only possible to search for ads while they are being currently served to users ([Meta Ad Library, n.d.a](#)). Political, electoral and sensitive ads are archived for seven years. It is also possible to access ads that have run “anywhere in the EU in the past year”.
2. Meta only allows for the systematic collection of political, electoral and sensitive ads data through its user interface or API ([Meta Ad Library, n.d.b](#)). In addition to the facilities offered to global researchers (see Brazil and Thailand), extra information is provided for ads delivered in the EU. These are: total impressions an ad received in the EU (estimated); targeting and reach demographic information specific to the EU (estimated), and; beneficiary and payer information. Critical information such as estimated audience size that a political ad reaches is consistently available, in contrast to Thailand and Brazil.
3. In general, advertisers on Meta do not need to go through any rigorous identity verification process and must only present a valid payment method to serve ads (Andreou et al., 2019). Verification of advertisers is only necessary for all profiles that want to run ads on social issues, politics and/or elections, housing, credit and employment (Meta, n.d.a; n.d.b) or some other businesses who may want to access some specific tools and technologies (Meta, n.d.c).
4. Similar to Brazil and Thailand, Meta allows the serving of ads about social issues, elections or politics. But the definitions of these notions remain vague, lacking contextualized details.
5. Ads about social issues, elections or politics are stored for up to seven years in Meta Ad Library, through which they are searchable by keywords and advertisers of interest, and can have their metadata collected systematically through its user interface or API ([Meta Ad Library, n.d.a; n.d.b](#)). In addition, per the terms of the DSA, Meta has committed to “displaying and archiving all the ads that target users in the EU while also including the parameters used to target the ads, as well as who was served the ad” ([REF](#)). It has also released a substantial report on how its recommender systems target personalized and political ads at specific users in anticipation of DSA requirements ([REF](#)).
6. Currently, the categorization of an ad as referring to social, electoral or political themes in Meta is up to the advertisers themselves, which is often wrong due to negligence or a lack of clearly defined criteria ([Le Pochat et al., 2022](#)). Once an ad is served, this labeling may be altered by Meta in a process that merges human curation with Artificial Intelligence ([Meta Transparency Center, 2024](#)), but the scope of these review actions is unclear. Nonetheless, Meta has explicitly recognized the regulatory pressure exerted by the DSA. In a [news release](#) on 30 October 2023, they state: “with new regulatory interpretations of permitted legal bases for personalized advertising under the GDPR, as well as the coming into force of the Digital Markets Act, *we are now required* to offer people in the EU, EEA and Switzerland an alternative way of using Facebook and Instagram [emphasis added]”. As a result, Meta now offers people in the EU, EEA and Switzerland “the choice to pay a monthly subscription to use Facebook and Instagram without any ads. They can alternatively continue to use these services for free while seeing ads that are relevant to them.” This provision is in addition to allowing users to choose a chronological feed for Facebook Reels and Instagram Stories in Europe. ([REF](#))

## Google Ads

1. The searchable repository of [Google ads](#) in the European Union comprises ads served from verified advertisers, that were “shown to users in the previous 365 days for non-political ads and from up to seven years ago for political ads.” Google also includes ads served from “unverified advertisers in Europe and Turkey”.
2. As with Brazil, Thailand and the US, Google’s Ads Transparency Center only allows search for names or website names of verified advertisers, thereby complicating ease of access for researchers. Similarly, the systematic collection of data from general ads served on its ad network is not permitted, except from political or election ads.
3. Google states that all of its advertisers will have to complete identity verification processes at some point to shield consumers from possible misleading, abusive and fraudulent advertisements ([Google, n.d.a](#); [Google, n.d.b](#)) and all electoral ads must be served by verified advertisers in the US ([REF](#)). It also offers certification programs so that advertisers from specific sectors, such as health, entertainment and gambling, comply with good practices ([Google, n.d.a](#)). However, the company states that there are occasions when “advertisers may continue to serve ads even if they have not started or completed the verification process or if they have not met all of its requirements” ([Google, n.d.b](#)) and several advertisers remain unverified ([REF](#)).
4. In the EU, election ads are defined as including ads that feature: “a political party, a current elected officeholder, or candidate for the EU Parliament; a political party; a current officeholder or candidate for an elected national office within an EU member state. Examples include members of a national parliament and presidents that are directly elected a referendum question up for vote, a referendum campaign group or a call to vote related to a national referendum or a state or provincial referendum on sovereignty” ([REF](#))
5. Although Google presents a public repository of ads labeled as political and electoral served on its ad network, it is only possible to search for advertisers through it, thus the interested user must know in advance the names under which advertisers have registered (Google Ads Transparency Report, n.d.). Searching for specific terms is not permitted, which substantially impairs navigation through the company’s advertising universe. Ahead of DSA requirements, enforceable as of 25 August 2023, Google announced that it was expanding its global ads transparency center by “providing additional information on targeting for ads served in the European Union” ([REF](#)). The Google Safety Engineering Center in Dublin, Ireland, is earmarked as an exemplar of outreach to industry and academic experts: a declared effort to enhance and sustain transparency standards. Similarly, the annual Google Transparency Report (since 2010) is cited as a hub for contemporary reporting on transparency—including with regard to digital advertising. Its [PDF Download Center](#) now contains substantial documentation on DSA compliance, including the (mandated) *EU Digital Services Act (EU DSA) Biannual VLOSE/VLOP Transparency Report*, which details various instances of “measures taken at Google’s initiative” to address advertisements that contravene their stated policy. Google does not distinguish between political and non-political ads in the document.

6. At present, Google claims that “advertisers may not run personalized ads, make use of any third party trackers, or otherwise attempt to collect personal information from minors or on content set as made for kids” ([REF](#)).  
Nonetheless, there is potential for future change, as Google has committed to expand data access for researchers [in the European Union only](#) ([REF](#)). Researchers must be affiliated with an educational institution and applications are approved by Google on a case-by-case basis. An approved researcher can receive permissions and access to data on the following platforms: Maps: Access to public data through a cloud-based solution; Play: Permission for limited scraping; Search: Access to an API for limited scraping with a budget for quota; Shopping: Permission for limited scraping; YouTube: Permission for limited scraping.

### Twitter/X Ads

1. Twitter/X only allows for the retrieval of ads served for users in the European Union ([Twitter/X Ads Repository, n.d.](#)). Advertisements are only retrievable in the previous year and the repository has basic functionality, much like TikTok.
2. In general, Twitter/X does not allow access to its ads data by crawlers and scrapers in its terms of use ([Twitter/X Help Center](#)). For researchers, the platform does not have clear guidelines on how to identify ads or provide clear identification suggesting if an ad was paid for or not in their platform. This hampers at-scale analysis of its advertising ecosystem. ([REF](#)).
3. Twitter/X states that all users who subscribe to paid Twitter Blue/X Premium plans, which allow users to access specific tools and to show a specific badge in their profiles, are allowed to run ads on the platform ([Twitter/X, n.d.a](#)). For this verification, the platform requires the user to have their account created more than 30 days ago, to have a valid cell phone number and to send personal documents ([Twitter/X, n.d.b](#)). However, various reports and academic studies point to X being overrun with scam ads, misinformation, fake and other problematic content.
4. Twitter/X distinguishes between what it calls “political content ads” and “political campaigning ads.” In its definition, the first would be those that “reference a candidate, political party, elected or appointed government official, election, referendum, ballot measure, legislation, regulation, directive, or judicial outcome” ([Twitter/X, n.d.d](#)). Political campaign ads are those “that advocate for or against, appeal directly for votes, or solicit financial support for a candidate or political party [OR] an election, legislation, referendum, or ballot measure.” ([Twitter/X, n.d.d](#)).
5. Twitter/X advertising repository offers basic functionality (see point 1) to European users ([Twitter/X Ads Repository, n.d.](#)). Nevertheless, users in the European Union cannot browse through political ads while using the tool.
6. As is the case in the US, renowned advertisers are leaving Twitter/X since the company takeover by Elon Musk ([REF](#)), unverified scammers have been running ads on the platform. Most notoriously, cryptocurrency fraud ads, not rarely accompanied by a photo of Elon Musk, are being targeted to the platform’s users by inauthentic advertisers ([REF](#); [REF](#)). Although the Twitter/X’s ads policies state that ads “must not promote products or services using deceptive marketing or misrepresentative business practices”, it also makes clear that the platform places all

responsibility for the content of ads to the advertisers, claiming that “you are responsible for all your promoted content on X[, which] includes complying with applicable laws and regulations regarding advertisements” (REF). In this regard, its approach is uniform across all four regions.

## TikTok Ads

1. The TikTok [Commercial Content Library \(CCL\)](#) is (only) available to users in the European Economic Area (EEA), Switzerland, and the UK. The CCL is a “a repository of ads and other types of commercial content posted on TikTok”, and contains two sub-libraries: the ad library and other commercial content. The ad library “features ads that we’re paid to display to users, including those that aren’t currently active or have been paused by the advertisers., while the ‘other commercial content’ library “includes content that promotes a brand, product or service and which we’re not paid to display.” (REF) One is not required to possess a TikTok account to access these repositories.
2. In contrast to Brazil, the CCL provides a meaningful repository of content, which can be searched according to target country, ad type, published date of the ad, advertiser name and/or keyword. Ads are only searchable from 1 October 2022—the first day of mandated compliance with the DSA. An ‘all ads’ report is also available on the Tik Tok Ad Library—though it is perfunctory in nature and lacking in meaningful detail. As of 25 March 2024, Tik Tok states that “We are working on making [our CCL] dataset available through an API soon.” (REF) No other details are provided.
3. Before, only advertisers who resided or operated in one of 32 selected European countries needed to complete verification processes in order to advertise on TikTok. Currently, the company states that it “will encourage advertisers to submit a business verification document for review”. Currently, there is no difference between the advice given to European and non-European entities on Tik Tok’s Business Verification tab (REF).
4. Political ads on Tik Tok are prohibited in Europe—as they are prohibited worldwide (REF). However, critical research has found that this policy is relatively easy to circumvent, particularly given that Tik Tok does not appear to monitor influencer advertising, nor are Tik Tok influencers required to disclose paid relationships with political groups (REF).
5. The TikTok CCL is available to users in the European Economic Area (EEA), Switzerland, and the UK. However, as Tik Tok officially prohibits political advertisement, this is not a searchable category in their ad library: it is only possible to search “general ads”.
6. To date, the TikTok Advertising Policies affirm that the platform does not allow ads that contain “inaccurate, misleading, or false content that may cause significant harm to individuals or society, regardless of intent” (REF). This should technically adhere to European regulations. However, as of 19 February 2024, the European Commission opened formal proceedings against Tik Tok, under the Digital Services Act (REF). The terms of the inquiry include evaluating Tik Tok’s failure to prevent negative effects stemming from the design of Tik Tok’s system—including ‘rabbit-hole effects’. In addition, the European Commission is investigating Tik Tok’s compliance with DSA obligations, “to provide a searchable and reliable repository for advertisements presented on TikTok”,

which may be indicative of Tik Tok's distinctly threadbare approach to advertisement transparency (see points 4 and 5).