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## **ANNUAL ACTIVITY REPORT OF THE HUNGARIAN DIGITAL SERVICES COORDINATOR**

Pursuant to Article 55 of the Digital Services Act (DSA),  
1 January 2025 – 31 December 2025

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Prepared by:

**National Media and Infocommunications Authority**

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## Executive summary

The Digital Services Act ("DSA") aims to provide a safe, predictable and reliable online environment for EU users of intermediary services, including online platforms, hosting services and search engines. Harmonised rules apply, for example, to (1) transparency regarding content moderation on online platforms, (2) users' access to out-of-court dispute resolution, and (3) the status of trusted flaggers and their transparency obligations. Other objectives of the DSA include combating illegal online content, protecting minors, and taking action against the spread of disinformation. Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) are subject to additional obligations, such as transparency of advertisements, assessing systemic risks arising from the use of their services, and publishing their risk-mitigation measures. While the first VLOP and VLOSE providers designated have had to comply with the requirements set out in the DSA since August 2023, smaller providers, such as the relevant Hungarian businesses, have been subject to the applicable provisions of the DSA only since 17 February 2024.

The Digital Services Coordinator ("DSC") is responsible for the implementation and supervision of compliance with the DSA by intermediary service providers established (or legally represented) in a specific Member State. Since 1 January 2023, the National Media and Infocommunications Authority ("NMHH") has been the DSC in Hungary, no other competent authority has been appointed. The President of the NMHH independently exercises all the powers and functions of the DSC.

According to Article 55 of the DSA, every DSC shall draw up and publish an annual report setting forth the complaints received by the DSC pursuant to Article 53 of the DSA, as well as its activities carried out in the Member State and at the international level during the previous year. The most important elements of the Hungarian DSC's annual report are as follows:

- In regulatory inspections initiated ex officio, the NMHH examined compliance with certain obligations imposed on intermediary service providers.
- In 2025, the DSC received 9 complaints, all of which concerned VLOPs established outside Hungary, so the NMHH forwarded them, where appropriate, to the DSC in the country where the VLOPs were established (in these cases, to the Irish Coimisiún na Meán).
- The NMHH considers it an essential responsibility to help users navigate the online world. To this end, the NMHH operates the [onlineplatformok.hu](https://onlineplatformok.hu) website, where it shares useful, practical advice on the responsible use of platforms, among other things.

The NMHH will share this report with the European Commission and the European Digital Services Board.

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## 1. Introduction

The Digital Services Act ("DSA")<sup>1</sup>, which entered into force in November 2022, has the primary objective to ensure a safe, predictable, and trusted online environment for users of intermediary services located in the EU Member States. A key ambition of the DSA is to improve the efficiency of action against illegal content in the online environment and to give EU citizens more freedom to exercise their fundamental rights, such as the right to freedom of expression, also in the online environment. As a novelty, users can now also take their complaints to external, independent, out-of-court dispute settlement bodies to object to decisions taken by providers. This will result in a more transparent functioning of online platforms, including in terms of processing user complaints. Online platform providers shall put in place appropriate and proportionate measures to ensure a high level of security and safety of minors.

Providers of Very Large Online Platforms ("VLOPs") and Very Large Online Search Engines ("VLOSEs") – collectively referred to as: "VLOPSE") with 45 million or more monthly active users in the EU are subject to additional obligations, such as providing transparency of advertisements or the publication of their assessment on systemic risks associated with the use of their services. These providers have had to comply with the requirements set out in the DSA since the end of summer 2023, while smaller providers, such as the relevant Hungarian businesses, have been subject to the applicable provisions of the DSA since 17 February 2024.

The Digital Services Coordinators (DSCs) are responsible for the supervision and enforcement of the Regulation in relation to intermediary service providers established in each Member State. In Hungary the National Media and Infocommunications Authority ("NMHH" or "Authority"), has been designated as the first Digital Services Coordinator in the European Union. Pursuant to Section 110 of Act CLXXXV of 2010 on Media Services and Mass Media, the President of the NMHH shall carry out the duties of the Digital Services Coordinator independently. No other competent authority was designated for the supervision and enforcement of the DSA in Hungary.

It is important to point out that for VLOPs, such as TikTok or Facebook, and VLOSEs, such as Google Search, the European Commission is responsible for the supervision and enforcement of the DSA. At the same time, Digital Services Coordinators can support the European Commission in this activity through the European Board for Digital Services established on 19 February 2024.

This document presents, in accordance with Article 55 of the DSA, key activities performed by the Hungarian DSC in relation to the supervision and enforcement of the DSA in 2025, including, in particular, information on complaints received under Article 53 of the DSA, out-of-court dispute settlement bodies and trusted flaggers.

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<sup>1</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act).

2. Complaints (Article 53 of the DSA)

Introduction

Article 53 of the DSA allows recipients of intermediary services to lodge complaints against the providers of these services in the event of an alleged infringement of the DSA. Complaints can be submitted to the Digital Services Coordinator in the Member State where the recipient of the service resides or is established.



The DSC will assess the complaint and, where appropriate, forward it to the DSC of establishment of the provider of intermediary services, accompanied by an opinion on the complaint.

Complaints

All complaints received by the Authority in the two years since the DSA took effect were directed against providers of Very Large Online Platforms, that are not established in Hungary. Therefore, in these cases, it is not the NMHH but the DSC in the jurisdiction where the platform provider is established that has the authority to take action; the NMHH cooperates in this process in accordance with the relevant legal provisions.

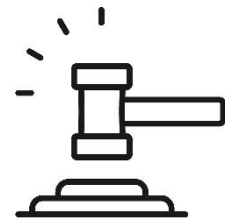
In 2025, the Authority received a total of 9 complaints related to the DSA: 7 of these complaints concerned user issues with Facebook, and 2 complaints concerned user issues with the TikTok. The complaints were typically related to restriction, termination, or suspension of accounts. The Authority forwarded the complaints received in full to the DSC of establishment of the online platform providers (in these cases, Ireland), who will investigate them in accordance with the DSA.

| DSC of establishment of the online platform | Number of complaints forwarded in 2025 |
|---------------------------------------------|----------------------------------------|
| Coimisiún na Meán – Ireland                 | 2                                      |

| Services concerned | Number of complaints received in 2025 | Status On 31 December 2025 | Reason                                                                                                                           |
|--------------------|---------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Facebook, TikTok   | 6                                     | closed                     | the complainant failed to respond to the NMHH’s request to remedy deficiencies, or did not collect the NMHH’s information letter |
| Facebook           | 1                                     | ongoing                    | In January 2026, the NMHH forwarded the complaint to the competent DSC (CnaM)                                                    |
| Facebook, TikTok   | 2                                     | forwarded to CnaM          | the competent DSC shall review the complaint                                                                                     |

### 3. Orders (Articles 9 and 10 of the DSA)

Article 9 of the DSA outlines the obligations of intermediary service providers upon the receipt of an order to act against illegal content, issued by the relevant national judicial or administrative authorities. First, if the service provider receives such an order, it shall inform the authority issuing such order, or any other authority specified in the order, of any effect given to the order, specifying if and when effect was given to the order. Article 9 of the DSA also sets out the mandatory content elements of orders issued by national authorities. The authority issuing the order or, any other authority specified therein, shall transmit it, along with any information concerning the effect given to that order to the Digital Services Coordinator from the Member State of the issuing authority and that Digital Services Coordinator shall share this information with all other Digital Services Coordinators.



Under Article 10 of the DSA, providers of intermediary services shall, upon receipt of an order concerning one or more specific individual recipients of the service, without undue delay also inform the authority issuing the order, or any other authority specified in the order, of its receipt and of the effect given to the order. Similarly to Article 9 of the DSA, Article 10 also sets out the mandatory content elements of orders issued by national authorities. The authority issuing the order or, any other authority specified therein, shall transmit it, along with any information concerning the effect given to that order to the Digital Services Coordinator from the Member State of the issuing authority and that Digital Services Coordinator shall share this information with all other Digital Services Coordinators.

In 2025, the NMHH did not receive any inquiries containing information regarding orders issued pursuant to Articles 9 and 10 and their implementation by service providers. During the reporting period, the NMHH Decree<sup>2</sup> governing the submission to the Authority of decisions regarding action against illegal content and the provision of information was still under preparation; however, at the time of preparing this report, the Decree is already in effect.

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<sup>2</sup> NMHH Decree No. 4/2026 (III. 10.) on the transmission of decisions regarding action against illegal content and the provision of information

#### 4. Out-of-court dispute settlement bodies (Article 21 of the DSA)

##### **Introduction**

Under the DSA, out-of-court dispute settlement bodies shall provide a way for users to settle their disputes with online platforms over content moderation. Online platforms shall inform users about this possibility and cooperate with certified dispute settlement bodies in their procedures. DSCs will certify, upon request, dispute resolution bodies in their respective Member States if they comply with the legal requirements set out in Article 21 of the DSA (for example, dispute resolution bodies must be independent and have relevant expertise).



##### **Entities certified by the NMHH as out-of-court dispute settlement bodies and their activities**

Pursuant to Section 13(2) of the IIS Act<sup>3</sup>, the NMHH maintains an official public register of entities it certifies as dispute settlement bodies under Article 21 of the DSA. Pursuant to Section 13(4) of the IIS Act, the data in the register are public and available on the Authority's website <https://english.nmhh.hu/online-platforms/out-of-court-dispute-settlement>.

In 2025, the NMHH did not receive any applications for registration as a dispute settlement body under Article 21 of the DSA.

According to the annual report on its activities in 2025, the **Online Platform Dispute Resolution Board (the so-called OPVT)**, which was registered by the NMHH in 2024 as an out-of-court dispute settlement body under the DSA<sup>4</sup>, received 86 requests in 2025, all of which, with one exception<sup>5</sup>, concerned account deletions or suspensions.

| Provider concerned | Number of requests received |
|--------------------|-----------------------------|
| Meta:              | 78                          |
| Google             | 3                           |
| Roblox             | 1                           |
| Temu               | 1                           |
| Snapchat           | 1                           |
| eBay               | 1                           |
| Vinted             | 1                           |
| Total              | 86                          |

Out of the 86 requests, one was rejected – following a substantive review – pursuant to Section 19(2)(c) of the IIS Act, as it was unfounded; in 22 other cases, the proceedings were terminated. A total of 17 cases were dismissed without examining the merits of the case.

<sup>3</sup> Act CIV of 2023 on certain rules regarding internet intermediary services (IIS Act)  
<https://net.jogtar.hu/jogszabaly?docid=a2300104.tv>.

<sup>4</sup> The OPVT's annual report [https://opvt.hu/dokumentum/258728/OPVT\\_eves\\_jelentes\\_2025.pdf](https://opvt.hu/dokumentum/258728/OPVT_eves_jelentes_2025.pdf).

<sup>5</sup> A request received against Temu, concerned a tax law issue, over which the OPVT has no jurisdiction.

The cases concluded with a recommendation (46 in total) most often concerned the restoration of user accounts or content posted by users, the lifting of restrictions, and/or compliance with the obligation to provide a statement of reasons. The online platform provider in question responded positively to the OPVT's recommendations issued in 2025 in only two cases.

| Decision                                   | Number of cases |
|--------------------------------------------|-----------------|
| Concluded with a recommendation            | 46              |
| Rejected without examination on the merits | 17              |
| Rejected                                   | 1               |
| Terminated                                 | 22              |
| Total                                      | 86              |

According to the data available at the time the OPVT's annual report for 2025 was finalized, only one proceeding was concluded with a settlement (representing 2.2% of all cases that were concluded with a recommendation).

## 5. Trusted flaggers (Article 22 of the DSA)

### **Introduction**

Trusted flaggers under the DSA are involved in detecting potentially illegal content and submitting notices thereof to online platforms. Online platforms are required by law to prioritise notices submitted by trusted flaggers, process them without undue delay and make decisions on the substance of such notices.



The status of 'trusted flagger' shall be awarded by the Digital Services Coordinator of the Member State in which the applicant is established. To that end, the applicant shall demonstrate that it meets all of the conditions set out in the DSA (e.g. independence from online platforms, diligence and expertise).

### **Organisations registered by the NMHH as trusted flaggers**

Pursuant to Section 14(1) of the IIS Act, the NMHH maintains an official public register of trusted flaggers under Article 22 of the DSA. Pursuant to Section 14(4) of the IIS Act, the data in the register are public and available on the Authority's website at <https://english.nmhh.hu/online-platforms/trusted-flaggers>.

Detailed rules on trusted flaggers are set out in the IIS Act and in NMHH Decree 7/2024 (VII.31.) on the Rules Applicable to Trusted Flaggers<sup>6</sup>.

In 2025, one organisation applied for certification as a trusted flagger under Article 22 of the DSA; however, as of the end of the reporting period, the NMHH had not yet decided on the matter.

<sup>6</sup> NMHH Decree 7/2024 (VII.31.) on the Rules Applicable to Trusted Flaggers: <https://njt.hu/jogszabaly/2024-7-20-3H>.

Currently, the [Internet Hotline \(IH\)](#) is the only organisation in Hungary with a trusted flagger status. IH is a public interest online information and legal assistance service, that is a member of INHOPE, an international association of hotlines working to combat the online sexual exploitation of children. According to the IH's annual report on its activities in 2025, prepared in accordance with the DSA<sup>7</sup>, a total of 2,575 reports were received in 2025, in connection with which the IH contacted the relevant hosting providers in 828 cases.

| Hosting provider contacted | Number of requests |
|----------------------------|--------------------|
| Telegram                   | 237                |
| Cloudflare                 | 142                |
| Meta                       | 97                 |
| TikTok                     | 50                 |
| Discord                    | 28                 |
| Google                     | 20                 |
| Other                      | 254                |
| <b>Total</b>               | <b>828</b>         |

In 688 cases (83% of requests), the hosting provider took action, while for the remaining 140 requests, the IH's procedure was unsuccessful, meaning that no response was received from the requested hosting service provider.

Online content considered to be illegal or harmful can be reported to the IH in eight categories. In 2025, the distribution of requests by content notified was as follows:

| Hosting provider concerned                                                  | Number of requests |
|-----------------------------------------------------------------------------|--------------------|
| content published without consent                                           | 211                |
| online bullying                                                             | 185                |
| phishing content                                                            | 168                |
| online child sexual abuse/child pornography                                 | 100                |
| other content harmful to minors                                             | 57                 |
| content promoting or encouraging the use of illegal psychoactive substances | 48                 |
| racist content, content inciting hatred against a community                 | 32                 |
| content inciting or promoting violent or illegal acts                       | 27                 |
| <b>Total</b>                                                                | <b>828</b>         |

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[https://nmhh.hu/cikk/258621/Az Internet Hotline DSA szerinti éves jelentése a 2025 január 1 es 2025 december 31 k ozotti idoszakrol](https://nmhh.hu/cikk/258621/Az%20Internet%20Hotline%20DSA%20szerinti%20ev%20jelentes%20a%202025%20januar%201%20es%202025%20december%2031%20k%20ozotti%20idoszakrol)

## 6. Vetted researchers (Article 40 of the DSA)

### **Introduction**

The procedural and technical requirements for data access requests are set forth in the DSA, and in the European Commission's Delegated Regulation, effective as of 29 October 2025,<sup>8</sup>.

Upon a reasoned request from the Digital Services Coordinator of establishment of VLOPSE providers, vetted researchers shall be provided access to non-public data of VLOPSE providers, within a reasonable period, as specified in the request, for the purpose of conducting research that contributes to the detection, identification and understanding of systemic risks in the Union, as set out pursuant to Article 34(1) of the DSA, and to the assessment of the adequacy, efficiency and impacts of the risk mitigation measures pursuant to Article 35. Systemic risks may include, for example, the dissemination of illegal content or negative effects for the exercise of fundamental rights, such as the right to freedom of expression.

Researchers may submit their data access requests to the DSC of their research institution or to the DSC of establishment of the VLOPSE; however, the final decision regarding the data access request always falls under the jurisdiction of the DSC of establishment of the VLOPSE provider. If researchers can sufficiently demonstrate that they meet all the conditions set forth in the DSA and the Delegated Regulation, the DSC of establishment of the VLOPSE provider shall grant these researchers the status of 'vetted researcher' for the research referred to in the application. VLOPSE providers are required to grant vetted researchers access to the data specified in the request.

### **Vetted researcher requests received by the NMHH in 2025**

In the summer of 2025, in order to inform Hungarian researchers interested in data access for researchers under Art. 40 of the DSA, the NMHH published detailed informational materials on its website,<sup>9</sup> as well as on the onlineplatformok.hu website,<sup>10</sup> regarding the most important rules governing researcher data access, the requirements for submitting requests, and also identified the point of contact through which interested Hungarian researchers may reach out to the NMHH. However, in 2025, the NMHH did not receive any requests for vetted researcher access to online platform data.



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<sup>8</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202502050](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502050)

<sup>9</sup> <https://nmhh.hu/online-platformok/kutatoj-adathozzaferes>

<sup>10</sup> <https://onlineplatformok.hu/cikk/elfogadta-az-europai-bizottsag-az-ellenorzott-kutatoj-adathozzaferessel-kapcsolatos-jogi-aktust>

## 7. Enforcement and other NMHH activities

### *Introduction*

The DSA established a number of new obligations for online intermediary service providers, and monitoring compliance with these obligations was one of the NMHH's top priorities in 2025. Acting within its supervisory authority as defined by law, the Authority conducted official inspections to verify compliance by online platform providers with certain obligations imposed by the DSA, and, continued its efforts to inform the relevant providers and users in order to promote partnerships with intermediary service providers and raise user awareness.

### *Official activities in 2025*

The NMHH strives to promote compliance among intermediary service providers and to establish and maintain a partnership with them. The NMHH informs service providers of their obligations under the DSA via its website<sup>11</sup>, the [onlineplatformok.hu](https://onlineplatformok.hu) site<sup>12</sup>, and, when possible, by way of contacting the service providers directly.



As part of its supervisory activities, the NMHH examines whether intermediary service providers are complying with fundamental obligations, such as the publication of an annual transparency report on content moderation pursuant to Article 15 of the DSA. In 2025, the NMHH conducted ex officio **regulatory inspections** of 21 online platforms operated by 15 service providers, examining their compliance with certain obligations imposed on online platform providers. The Authority conducted its inspections based on the following key issues:

- whether the operators of online platforms have published, in the publicly accessible section of their websites, the average number of monthly active users of their services in the European Union over the previous six months,
- whether the online platforms have been registered in the [DSA transparency database](#) operated by the European Commission, in order to comply with their obligation to transmit their statements of reasons for content moderation without undue delay,
- whether intermediary service providers have published, in an easily accessible manner, their transparency reports for the first reporting cycle (17 February 2024 – 16 February 2025) regarding the content moderation they perform,
- whether the online platform providers have submitted their annual net revenue figures from services subject to the DSA or their statements regarding exemption from the obligation to pay the supervisory fee imposed on online platform operators to the NMHH.

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<https://nmhh.hu/cikk/257083/Tajekoztato-a-kozvetito-szolgalatok-tartalommoderasrol-szolo-2025-evi-atlathatosagi-jelentes-erol>; <https://nmhh.hu/cikk/258194/Tajekoztato-az-onlineplatformszolgalatok-altal-fizetendo-2026-evi-felugyeleti-dijrol>

<sup>12</sup> <https://onlineplatformok.hu/cikk/bizottsagi-konzultacio-a-buncselekmények-gyanujanak-bejelentese-rol-dsa-18-cikk>

Under the DSA, hosting providers are required to inform their users about their decisions regarding content moderation and to explain the rationale behind those decisions. To increase transparency and facilitate the review of content moderation decisions, online platform operators must submit these statements of reasons to the DSA transparency database maintained by the European Commission. In 2025, the NMHH verified whether service providers established in Hungary and are subject to this obligation had registered in the transparency database, and it continues to support platform providers in completing this registration process. By the end of 2025, a total of 39 online platform services had been registered on the electronic portal operated by the European Commission<sup>13</sup>.

Also, to ensure transparency in service providers' activities, intermediary service providers (with the exception of those classified as micro or small enterprises) are required, pursuant to Article 15 of the DSA, to provide information regarding the content moderation they perform (including measures taken as a result of the application and enforcement of their terms of service). The first reporting cycle ended on 16 February 2025. For that reporting period, providers were permitted to choose whether to publish their transparency reports using the templates set out in Commission Implementing Regulation (EU) 2024/2835 laying down templates concerning the transparency reporting obligations of providers of intermediary services and providers of online platforms under Regulation (EU) 2022/2065 of the European Parliament and of the Council, or in a format of their own choosing. In the second half of 2025 the Authority conducted inspections among a wide range of intermediary service providers to verify compliance with their obligations regarding the preparation and publication of reports. To ensure compliance with reporting requirements, the Authority published a guidance on its website outlining the main rules governing reporting. At a workshop organized for the representatives of Hungarian electronic communications service providers, NMHH also presented in detail the main reporting requirements<sup>14</sup>.

As of 2024, to cover the costs incurred in connection with the regulatory activities carried out in its capacity as digital services coordinator, online platform providers established in Hungary (with the exceptions specified in the law) must pay a supervisory fee to the NMHH, and, to ensure that the amount of the supervisory fee payable can be verified, they are required to provide certain underlying data to the Authority. In 2025, the Authority verified that the relevant service providers had complied with their reporting and declaration obligations regarding the supervisory fee, and, based on the submitted reports, took measures to ensure payment of any outstanding fees.

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<sup>13</sup> Of these, the onboarding process has been fully completed for 9 online platforms, while for another 30 online platform services, the process is currently in various stages of onboarding

<sup>14</sup> Following the reporting period, the Authority gave a presentation to online platform operators at a workshop held on 22 January 2026, regarding the preparation and publication of transparency reports.

## **Other activities in 2025**

### Cooperation with market participants, organisations, and relevant authorities

In 2025, the NMHH continued its consultations with intermediary service providers and their industry associations in order to contribute to the compliance of the relevant providers concerned by building partnerships.

In March 2025, the NMHH organised a **workshop** with the participation of members of the **Communications Reconciliation Council**<sup>15</sup> (HÉT), at which the initial findings from the OPVT's activities were presented, along with the system of obligations under the DSA, with particular emphasis on the requirements related to transparency reports that also affect electronic communications service providers. At the request of the NMHH, as part of a 2025 study<sup>16</sup>, Impetus Research Kft. also examined **experiences related to the introduction of the DSA** among operators of Hungarian online platforms that do not qualify as marketplaces (advertising portals, video-sharing platforms, job portals, and ticket sales platforms). Hungarian service providers gave a positive assessment of the NMHH's role as the DSC, highlighting the authority's supportive, cooperative, and proactive regulatory approach, while also voicing their critical comments regarding the DSA and noting that, for Hungarian companies – partly due to their size and the nature of their services – compliance with certain obligations is unreasonable and imposes an excessive administrative burden. In preparation for the second anniversary of the DSA's implementation, preparations began as early as 2025 for the NMHH's DSA industry forum, scheduled for January 2026, where numerous experts familiar with the practicalities of DSA implementation were able to share their experiences and insights regarding the DSA's market impact, as well as the efficiency and effectiveness of its implementation.

To strengthen effective online child protection, in October 2025 the NMHH signed a cooperation agreement<sup>17</sup> with **Bethesda Children's Hospital** with the aim of using joint research, scientific conferences, and public awareness campaigns to combat the premature and excessive use of digital devices by children and its harmful effects. Also in the autumn of 2025, the NMHH and the Internet Roundtable for Child Protection joined Bethesda Children's Hospital's **charter** aimed at reducing children's screen time<sup>18</sup>. The document, which has already been signed by around forty professional organizations, draws on scientific findings and domestic and international literature to provide guidance<sup>19</sup> to parents, professionals, and policymakers on achieving a healthy digital balance.

In November 2025 [a cooperation agreement](#) was signed between the NMHH and the **National Intellectual Property Office** (SZTNH). The primary goal of this collaboration is to strengthen a safe online environment, promote the enforcement of rights in the digital space, raising

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<sup>15</sup> The HÉT website: <https://hirkozlesitanacs.hu/>

<sup>16</sup> <https://onlineplatformok.hu/cikk/a-dsa-bevezetesevel-kapcsolatos-tapasztalatok-a-hazai-nem-piacter-platformoknal>

<sup>17</sup> [https://nmhh.hu/cikk/255315/Egyuttmukodes\\_a\\_gyermekek\\_egeszseges\\_digitaliseszkozhasznalataert](https://nmhh.hu/cikk/255315/Egyuttmukodes_a_gyermekek_egeszseges_digitaliseszkozhasznalataert)

<sup>18</sup> <https://www.bethesda.hu/kepernyoido-csokkento-program/>

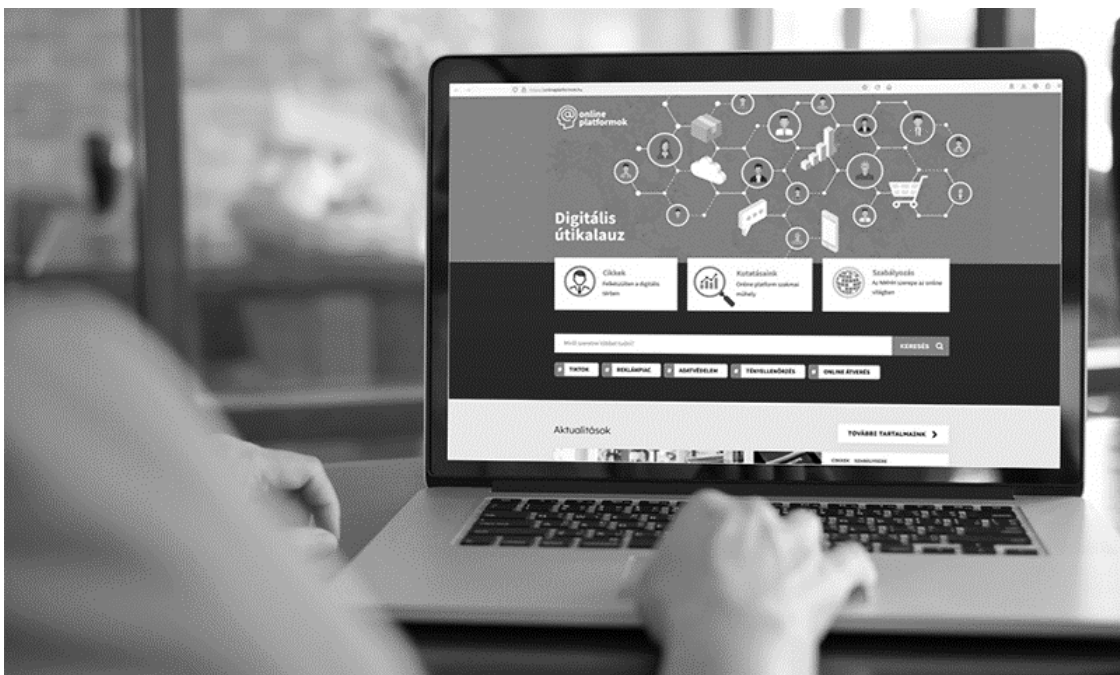
<sup>19</sup> Among other things, the recommendation emphasises that screen time is not recommended for children under the age of three, and that children under the age of ten should under no circumstances have their own smart devices, while those under the age of 14 should avoid having them, if possible.

awareness of intellectual property infringements committed online, and, at the same time, supporting the sharing of professional knowledge. This cooperation also ensures the mutual sharing of information regarding the application of the DSA.

In view of the April 2026 **parliamentary elections**, the NMHH began preparations as early as 2025 Q3<sup>20</sup> to ensure that there would be sufficient time before the expected date of the parliamentary election to contact stakeholders, hold consultations, and carry out communication activities aimed at promoting user awareness. In addition to the other authorities and bodies involved in the elections (the National Election Office, the National Election Commission, the National Cyber Security Institute of the National Security Service, the Supreme Court, and the Constitutional Court) and has also contacted VLOPSE service providers and experts from the European Commission so that the parties can keep each other informed about the measures introduced during the election period.

#### Education, promoting media literacy, and public outreach

In addition to the supervision of providers covered by the DSA, the NMHH considers it an essential responsibility to help users navigate the online world. To this end, in May 2023, the Authority launched [onlineplatformok.hu](https://onlineplatformok.hu) to publish short articles to raise awareness of regulatory updates and informed platform use, as well as studies commissioned from external researchers to assess the social impact of online platforms, available to all.



In the **research studies** published and conducted in 2025 – in addition to the aforementioned provider experiences related to the introduction of the DSA – the NMHH examined, among

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<sup>20</sup> The report prepared by the Hungarian DSC on its activities related to the parliamentary elections is available at: [https://nmhh.hu/cikk/259719/A\\_magyarorszag\\_i\\_digitalis\\_szolgaltatasi\\_koordinator\\_nak\\_az\\_oroszaggyulesi\\_valasztassal\\_kapcsolatos\\_beszamoloja](https://nmhh.hu/cikk/259719/A_magyarorszag_i_digitalis_szolgaltatasi_koordinator_nak_az_oroszaggyulesi_valasztassal_kapcsolatos_beszamoloja)

other things, the characteristics of smartphone use among young adults<sup>21</sup>, the accessibility of Hungarian online platforms<sup>22</sup>, the world of influencer marketing<sup>23</sup>, the various business models of online platforms<sup>24</sup>, the effects of the DSA and the Digital Markets Act (DMA) on the Hungarian advertising market<sup>25</sup>, data protection issues related to images posted on social media<sup>26</sup>, the use of online marketplaces among Hungarian micro, small, and medium-sized enterprises<sup>27</sup>, the use of online platforms and related legal awareness among the general public<sup>28</sup>, the relationship between cyberbullying prevention and the development of digital competencies<sup>29</sup>, and, through mystery shopping, examined fraud and scams observed on online platforms<sup>30</sup>.

In the NMHH **podcast series**<sup>31</sup>, in addition to analysing artificial intelligence and the phenomenon of deepfakes, experts discussed, among other things, the effects of constant online content consumption and how the digital space is reshaping our attention, our patience, and our everyday decisions.

At the end of 2025, the NMHH drew attention to the dangers of **online scams** in articles published on its websites and by joining the European Commission's educational campaign, as well as what suspicious signs to look out for – especially when shopping online –, how to spot suspicious messages, links, and websites, and where to turn for help in such situations.



Furthermore, since the overwhelming majority of complaints received by the NMHH to date have been related to the restriction or termination by platforms of user accounts and channels registered on social media and video-sharing platforms, the NMHH has published a series of articles on [onlineplatformok.hu](https://onlineplatformok.hu), summarising what users of the most popular platforms can do to avoid these measures<sup>32</sup>.

<sup>21</sup> <https://onlineplatformok.hu/cikk/a-telefonhasznalat-mikro-mintazatai-a-fiatalok-es-felnottek-koreben>

<sup>22</sup> <https://onlineplatformok.hu/cikk/hazai-online-platformok-akadalymentesese>

<sup>23</sup> <https://onlineplatformok.hu/cikk/kozossegi-media-platformok-szerepe-a-tartalomgyartok-monetizacios-lehetosegei-kapcsan>

<sup>24</sup> <https://onlineplatformok.hu/cikk/online-platformok-uzleti-modelljeinek-erzekelese>

<sup>25</sup> <https://onlineplatformok.hu/cikk/az-unios-szabalyozas-hazai-reklampiacra-vonatkozó-hatasainak-felmerese-2>

<sup>26</sup> <https://onlineplatformok.hu/cikk/zart-profilok-elonyei-mi-tortenik-a-kepeimmel-miutan-feltoltottem-oket>

<sup>27</sup> <https://onlineplatformok.hu/cikk/online-piacterek-hasznalata-a-kkv-k-koreben-2024-ben>

<sup>28</sup> <https://onlineplatformok.hu/cikk/digitalis-piacok-szabalyozasanak-ismerete-a-lakossag-koreben>

<sup>29</sup> <https://onlineplatformok.hu/cikk/csokkentetheto-a-cyberbullying-a-digitalis-irastudas-fejlesztesevel>

<sup>30</sup> <https://onlineplatformok.hu/cikk/online-platformokon-tapasztalhato-visszaelesekkel-kapcsolatos-kutatas>

<sup>31</sup> <https://www.youtube.com/watch?v=vdn1ienR-0k&list=PL-uy4jS2ReJerAY3KeEV4x2MuznP4g0qU>

<sup>32</sup> <https://onlineplatformok.hu/cikk/hogyan-kerulheted-el-az-instagram-fiokod-felfuggeszteset-vagy-torleset;>

<https://onlineplatformok.hu/cikk/hogyan-kerulheted-el-a-tiktok-fiokod-felfuggeszteset-vagy-torleset;>

<https://onlineplatformok.hu/cikk/hogyan-kerulheted-el-a-youtube-fiokod-felfuggeszteset-vagy-torleset;>

<https://onlineplatformok.hu/cikk/hogyan-kerulheted-el-a-facebook-fiokod-felfuggeszteset-vagy-torleset>



The Internet Roundtable for Child Protection<sup>33</sup>, which supports the work of the NMHH President, launched a nationwide program at the end of 2025 called “**Online Heroes**”<sup>34</sup>, which demonstrates how digital house rules<sup>35</sup>, the use of filtering software<sup>36</sup>, and appropriate parental guidance can help conscious families in developing a responsible online presence and recognising digital threats – ranging from the challenges posed by artificial intelligence<sup>37</sup> to the risks of cyber scams<sup>38</sup>.

#### International activities

In accordance with the provisions of the DSA, **the European Board for Digital Services** (hereinafter: “Board”), which brings together digital services coordinators to support the work of the European Commission and the other DSCs, began operations in February 2024, along with its eight working groups.

The Board’s regular meetings and the working groups provide an opportunity for the DSCs to share their experiences and expertise with one another, thereby contributing to the analysis of new issues related to digital services arising in the internal market and to the development of common solutions.

In 2025, the NMHH participated in all of the Board’s meetings – a total of 6 regular and 3 special meetings – and also played an active role in the work of all of the Board’s working groups.

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<sup>33</sup> <https://nmhh.hu/gyermekevedelmi-kerekasztal>

<sup>34</sup> [https://nmhh.hu/cikk/256108/Online\\_Hosok\\_a\\_gyermekek\\_tudatos\\_internethasznalataert](https://nmhh.hu/cikk/256108/Online_Hosok_a_gyermekek_tudatos_internethasznalataert)

<sup>35</sup> [https://nmhh.hu/cikk/252807/Elesitsd\\_a\\_csaladi\\_akciotervet](https://nmhh.hu/cikk/252807/Elesitsd_a_csaladi_akciotervet)

<sup>36</sup> [https://nmhh.hu/cikk/252808/Digitalis\\_vedelmi\\_rendszer\\_aktivalva](https://nmhh.hu/cikk/252808/Digitalis_vedelmi_rendszer_aktivalva)

<sup>37</sup> [https://gyerekaneten.hu/kiadvany/Mi\\_a\\_helyzet\\_az\\_Mlvel](https://gyerekaneten.hu/kiadvany/Mi_a_helyzet_az_Mlvel)

<sup>38</sup> [https://nmhh.hu/cikk/252805/Szimatold\\_ki\\_az\\_online\\_trukkoket](https://nmhh.hu/cikk/252805/Szimatold_ki_az_online_trukkoket)

## **8. Conclusions**

The NMHH strives to inform intermediary service providers about their obligations both on its website and through professional workshops. During the reporting period, the Authority conducted ex officio inspections to verify compliance with certain obligations imposed on Hungarian intermediary service providers under the DSA; however, it did not deem it necessary to initiate formal proceedings in any of the cases at this time.

In addition to its DSA regulatory activities, the NMHH also strives to help users exercise their rights more effectively by providing the widest possible range of information, and by making information easily accessible on its website, to assist users in exercising their rights more effectively in the digital space. As a knowledge hub for DSA – through research collaborations – it seeks to assess the social impacts of online platform use, publish the findings on the NMHH's various online websites and social media accounts, and collaborate with authorities overseeing other areas related to the DSA.