DIGITAL SECURITY LAB ANNUAL REPORT



GENERAL INFORMATION

Digital Security Lab is a Ukrainian non-governmental organization that was founded in September 2017. It helps journalists, civil society activists, and human rights defenders address digital security challenges and promotes the protection of human rights on the Internet by influencing state policies in the field of digital rights.

The organization's mission is to promote the realization of human rights on the Internet by strengthening the capacity of civil society organizations and independent media to address their digital security issues and influencing state and corporate policies in the field of digital rights.

The values of Digital Security Lab:

Support - the primary goal of the organization is to assist civil society.

Independence - the organization independently determines its areas of work and is not affiliated with any political forces.

Team - the organization cares about the well-being of its employees and consultants.

Professionalism - the team continuously develops its expertise and adheres to high standards of work.

Autonomy - the organization's team is capable of self-organization and can operate without supervision.

Ethics - the organization ensures the confidentiality of its clients and adheres to ethical principles.

Responsibility - the organization takes full responsibility for its work and actions.

SCOPE OF WORK

Digital security for civil society (including human rights organizations, independent media, activists, etc.):

- Digital security consulting;
- Digital security audits;
- Digital security training sessions;
- Incident response and forensics;
- Long-term support for organizations.

Digital rights:

- Analysis of legislative initiatives affecting human rights on the Internet;
- Research and analysis of international practices in the field of human rights and the Internet;
- Development of recommendations and proposals for legislative changes in the field of digital rights.

ANNUAL RESULTS

DIGITAL SECURITY

In 2024 **DSLU** supported 80+ Ukrainian civil society organizations, including independent media, human rights groups, public accountability initiatives, and others.

- **20 training sessions** were conducted on critical topics such as using password managers, securing messenger apps against data breaches, mobile devices protection, and fundamental digital security skills. Over 300 participants attended trainings and webinars, giving an average training satisfaction rating of 4.5 out of 5.
- **8 digital security audits** were performed: 4 for independent media organizations, 2 for volunteer groups, 1 for a human rights organization, and 1 for a public advocacy organization.

Throughout the year, the team supported **96 cybersecurity incidents**, helping organizations and individuals mitigate threats and strengthen their resilience. These incidents included:

- 33 cases of phishing attempts with malicious attachments,
- 25 cases of phishing attacks via fraudulent URLs,
- 2 cases of Distributed Denial-of-Service (DDoS) attacks,
- 20 cases of account hacking,
- 6 cases of social media account restrictions,
- 6 cases related to psychological operations (PsyOps) and disinformation campaigns,
- 2 cases involving Facebook glitches affecting account access and security.

In 2024, DSLU provided **353 consultations**, assisting Ukrainian civil society organizations, journalists, and activists with a wide range of digital security and technical needs. These consultations covered topics such as phishing prevention, secure communication, and account protection, as well as hands-on technical support, including setting up secure computers, networks, and digital tools.

Additionally, **18 educational materials** were developed for the YAK website, providing practical guidance on digital security, threat mitigation, and secure online practices tailored to the needs of civil society organizations.

DSLU also contributed to the <u>OSINT course on Prometheus</u>, preparing a dedicated module on digital security. This section equips journalists, activists, and researchers with essential tools and strategies to protect their devices, data, and online activities while conducting open-source investigations.





DIGITAL RIGHTS

Artificial Intelligence

DSLU has contributed to finalising the HUDERIA Methodology - a tool for assessing the impacts of AI systems on human rights, democracy and the rule of law. DSLU legal team has participated in the 12th plenary meeting of the Council of Europe's Committee on Artificial Intelligence held on 26-28 November and submitted its written comments to the draft Methodology. Particularly, the Committee has included DSLU proposals on harmonising the terminology of the document with the Council of Europe Framework Convention on AI, as well as including the mapping not only of actual but also possible risks stemming from the AI systems. DSLU also helped to update the part of the Methodology devoted to remedies that shall be made available in case of potential or actual breaches. Our legal team plans to further engage in the process of finalizing the HUDERIA Model aimed at practical implementation of the Methodology.

DSLU experts participated in the sessions of the <u>Expert Committee</u> on Al under the <u>Ministry for Digital Transformation of Ukraine</u>, contributing to the development of soft law documents on Al.

Among the most prominent regulatory pieces are recommendations on AI in the spheres of <u>advertising and marketing communications</u>, <u>personal data protection</u>, <u>education</u>, and <u>intellectual property</u>, as well as the <u>AI Dictionary</u> comprising the most commonly used terminology in the AI domain. DSLU lawyers have also consulted the Ministry for Digital Transformation, the National Broadcasting Council and the Ministry of Culture and Strategic Communications on various aspects of AI regulation and safe AI use in the public sector, lectured students and journalists on AI and disinformation topics (particularly, on combating deepfakes and illegal content via AI-driven tools).

DSLU's legal team has also developed multiple analytical materials on Al governance, threats stemming from the malicious use of Al, as well as toolkits for civil society to enhance the safe and responsible use of Al systems. For example, DSLU's <u>analytical study</u> 'Running Up That Hill: Artificial Intelligence in the Ukrainian Public Sector' examines Al regulation initiatives and public sector projects in Ukraine, assessing their impact on human rights and democracy. It provides policy recommendations on regulation, risk assessment, transparency, and civil society involvement in Al governance. The <u>policy brief</u> 'Labeling Al-Generated Content: How Governments and Companies Enhance Transparency in Media and

Social Networks' examines global efforts to enhance transparency of Al-generated content in media and social media. It highlights labeling methods, risks of Al-generated content, and recommendations for policymakers, developers, media, and users, as well as covers regulatory initiatives like the EU Al Act, national laws, and industry practices by Google, Meta, and OpenAl.

Moreover, DSLU contributed in raising public awareness on AI responsible use by organizing and holding public discussions. Thus, DSLU hosted an online workshop 'Safety Recipes: How to Avoid Al Risks' for civil society and media, and presented the 'Guide to Using Al Systems in Line with Human Rights,' sharing recommendations on mitigating Al-related risks. The discussion emphasized the importance of privacy policies, account security settings, complaint mechanisms, and continuous monitoring of AI system updates to prevent potential risks. In addition, DSLU held the online event 'At the Cutting Edge of Innovation: Artificial Intelligence in the Public Sector.' presenting research, which analyzes key international regulatory initiatives on AI development and use, Ukraine's regulatory progress, and the safety of state Al projects from a human rights perspective. The presentation was followed by an expert discussion on AI development in the public sector, covering government plans, regulatory needs, technological sovereignty, and the importance of awareness-raising before full AI implementation.

Personal Data Protection Reform

DSLU actively contributed to the ongoing personal data protection reform. Particularly, DSLU legal counsels drafted the amendments to the <u>Draft Law on Personal Data Protection</u>. DSLU paid particular attention to harmonising the provisions of the Draft Law with the GDPR requirements, as well as ensuring that media and journalists' rights are adequately balanced against privacy considerations. DSLU also consulted various state authorities on the development of personal data protection-oriented policies and implementing best practices of personal data protection while introducing new technological solutions.

Digital Services

DSLU assisted Ukraine's Ministry for Digital Transformation in preparing for the implementation of EU legislation in the sphere of platform regulation. Its legal team worked on preparations for the TAIEX meeting on the Digital Services Act in Brussels in April 2024 and helped the Ministry prepare various documents for enacting the roadmap for DSA



implementation suggested by the EU Commission for the candidate countries. In line with the roadmap, DSLU will continue working on and reviewing the previously drafted DSA-type legislation in the near future, now as a part of Ukraine's negotiation group under Chapter 10 of the acquis communautaire ("Digital Transformation and Media").

Media Freedom

DSLU worked on harmonising Ukraine's media regulation with EU standards, including the revised Audiovisual Media Service Directive and the European Media Freedom Act. Its experts co-drafted the <u>Draft Law on Amending Certain Laws of Ukraine in the Sphere of Media</u>, adopted in the first reading in December. If adopted, it will strengthen the media regulator's independence and enhance media ownership transparency in line with EMFA's Articles 6 and 7. DSLU has also prepared <u>the EMFA Implementation Action Plan</u> by analyzing the media legislation in force and providing a set of targeted policy amendments to transpose and implement EMFA in Ukraine.

Additionally, throughout 2024, DSLU provided regular updates on key developments in Ukraine's media law and digital rights regulation landscape through monthly digests. Overall, 12 digests were published throughout the year, which can be accessed by the <u>link</u>.

Furthermore, DSLU's <u>report</u> "Disinformation Under Sanctions: How European Regulators Counter False Information" explores the evolving role of media regulators and sanctions in combating disinformation in Europe. It examines key trends in international law, recent ECHR decisions, and regulatory measures taken since 2014, particularly in response to Russian propaganda. The study also analyzes how sanctions have become a key political and legal tool to limit the spread of false narratives, especially following Russia's full-scale invasion of Ukraine in 2022.

Digital Rights School

On 19-23 August 2024 DSLU held Digital Rights School for 15 law students and lawyers. The educational program covered national legislation, best practices and recent developments in the sphere of Internet freedom and international human rights law, with particular focus on freedom of expression in war context and the EU regulation to be implemented into the national legal system in light of the Ukrainian EU accession negotiations. DSLU organized 2 panel discussions inviting representatives from state authorities - Ministry of Digital Transformation and National TV and radio

broadcasting to provide updates on the progress with implementation of EU law in the areas of media reform, online platforms regulation and artificial intelligence. Within the Digital Rights School students were also engaged in two practical sessions and case studies - on the issues of personal data protection (including in the work of journalists) and Al impact on human rights (including online content); as well as participated in a workshop on disinformation learning to identify Al generated content and key disinformation techniques. DSLU also conducted a basic digital rights training for participants of the Digital Rights School.





FINANCIAL REPORT

Sources of financial support:

- Internews Network
- Article 19
- Human Rights Centre ZMINA +EU
- Access Now
- HIVOS (Digital Defenders Program)
- The International Renaissance Foundation (Відродження)
- International Media Support (IMS)
- UNESCO + People of Japan
- Embassy of the Czech Republic in Ukraine

Expenses in 2024 (UAH):

- Staff salaries 17,119,555
- Consultant fees 1,179,383
- Procurement and maintenance of equipment 246,987
- Office rent 586,840
- International conferences and training 2,422,260
- External audit 202,400
- Banking expenses 42,858
- Administrative expenses 62,641

Total: 21,862,924



