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

pursuant to Art. 55. of the Digital Services Act  
1 January 2024 – 31 December 2024

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Prepared by:

**National Media and Infocommunications Authority**

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## Executive summary

The Digital Services Act ("DSA") provides harmonised rules to ensure a safe, predictable and trusted online environment when using intermediary services, including online platforms, hosting services and search engines. Examples of these rules include (1) additional transparency requirements regarding how online platforms moderate content, (2) citizens' access to out-of-court settlements and (3) rules for the status of trusted flaggers and transparency obligations of trusted flaggers. The DSA also aims to prevent illegal content online and protect minors, as well as prevent the spread of disinformation. Providers of very large online platforms ("VLOPs") and very large online search engines ("VLOSEs") face additional scrutiny, such as the obligation to provide transparency on advertisements or publish their assessment of systemic risks.

The DSA is enforced by the national Digital Service Coordinators ("DSCs") and, where they have been designated as competent authorities in their Member States, by other national authorities. For VLOPs and VLOSEs, DSA enforcement is carried out by the European Commission. As of 1 January 2023, the National Media and Infocommunications Authority (NMHH) was appointed as the Digital Service Coordinator in Hungary, and no other competent authority has been designated. The President of the NMHH performs the duties and tasks of the DSC.

While the first group of designated VLOPs and VLOSEs was subjected to the DSA already in August 2023, the DSA has only been fully applied to all online intermediaries since 17 February 2024.

According to Article 55 of the DSA, every DSC must prepare and publish an annual report detailing its activities performed during the previous year. The report must include information on complaints received under Article 53, as well as details of the DSC's other national and international activities.

The most important elements of the Hungarian report are as follows:

- In 2024, the NMHH received 12 complaints, all of which were regarding VLOPs, established outside of Hungary, therefore these complaints were forwarded to the DSC of establishment, in these cases the Irish DSC, Coimisiún na Meán (CnaM).
- In 2024, the NMHH certified one out-of-court dispute settlement body, the [OPVT](#).
- In 2024, the NMHH awarded trusted flagger status to the [Internet Hotline](#), which is part of the [INHOPE](#) network.
- The NMHH is committed to contribute to the empowerment of Hungarian users by sharing useful, practical advice on the [onlineplatformok.hu](#) website, which is operated by the NMHH.

This report will be shared with the European Commission and the European Board for Digital Services.

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## 1. Introduction

The Digital Services Act<sup>1</sup> (DSA) which entered into force in November 2022, has the primary objective to provide a safe, predictable and trusted online environment for users of intermediary services. A key ambition of the DSA is to fight 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 online platform 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 safety of minors.

Providers of Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs), with 45 million or more monthly active users in the EU are subject to additional obligations, such as publishing an advertisements repository or identifying, analysing and assessing any systemic risks in the Union stemming from the design or functioning of their service and its related systems, and put in place reasonable, proportionate and effective mitigation measures, tailored to the specific systemic risks identified. The first VLOP and VLOPSE providers have had to comply with the requirements set out in the DSA since the end of the summer of 2023, while smaller providers, such as the relevant Hungarian businesses, have been subject to the applicable provisions of the DSA since 17 February 2024.

Digital Services Coordinators (DSCs) are responsible for the supervision and enforcement of the DSA in relation to intermediary service providers established in each Member State. In Hungary the National Media and Infocommunications Authority (NMHH) has been designated as Digital Services Coordinator. Pursuant to Section 110 of Act CLXXXV of 2010 on Media Services and Mass Media, the President of the NMHH shall carry out all the DSC duties independently. No other competent authority was designated 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, DSCs 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 undertaken by the Hungarian DSC in relation to the supervision and enforcement of the DSA in 2024, 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 DSC 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 in the Member State where the provider of the intermediary service is established, possibly accompanied by an opinion. If the complaint falls under the responsibility of a different authority within the same Member State, the DSC will transmit the complaint to the appropriate relevant authority.

### **Complaints**

In 2024, the Hungarian Digital Services Coordinator received a total of 12 complaints related to the DSA, of which 9 complaints concerned user issues with Facebook, while 3 complaints concerned user issues with YouTube. Complaints were typically related to account termination, channel removal or banning profiles and pages.

Number of cases	Provider(s) concerned	Status as at 31.12.2024	Reason
2	Meta	ongoing	request by the NMHH for further information
3	Meta, Google	closed	the complainant failed to respond to the NMHH's request for further information
6	Meta, Google	forwarded to CnaM	
1	Google	suspended	dispute settlement procedure pending in the case

Until 31 December 2024, one case was suspended due to proceedings pending before the out-of-court dispute settlement body and three cases were closed due to the complainants' failure to respond to the DSC's request for further information. Complete complaints received were forwarded by the NMHH to the DSC of establishment of the online platform operators (in these cases, in Ireland). In three of these cases, the Irish DSC requested the NMHH to forward its information letter to the complainant, while, in one case, made a request for further information, and the Hungarian DSC duly obviously complied with these requests.

## 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 DSC from the Member State of the issuing authority and that DSC shall share this information with all other DSCs.

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 DSC from the Member State of the issuing authority and that DSC shall share this information with all other DSCs.

In 2024, the NMHH did not receive any information on orders issued under Articles 9 or 10.

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

##### ***Introduction***

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

##### ***Certification of out-of-court dispute settlement bodies in 2024***

Pursuant to Section 20 of Act CIV of 2023 on certain rules regarding internet intermediary services<sup>2</sup> (hereinafter: IIS Act), the Online Platform Dispute Resolution Board (the so-called OPVT) was established with the appointment of the chairman and eight members of the Board on 18 July 2024. The OPVT is an independent body established by law by the Member State in accordance with Article 21(6) first subparagraph of the DSA.

The OPVT's role is to seek to reach a settlement between the parties in order to resolve disputes in the cases referred to it, where prior settlement of the issues concerning the provider's decisions through the provider's internal complaints handling system failed. Online platforms are required to participate in the OPVT's procedures.

On 29 August 2024, the President of the NMHH certified and registered the OPVT as an out-of-court dispute settlement body under Article 21 of the DSA.

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<sup>2</sup> Act CIV of 2023 on Certain Rules regarding Internet Intermediary Services: <https://net.jogtar.hu/jogszabaly?docid=a2300104.tv>.

According to the OPVT's annual report on its activities in 2024 under the DSA<sup>3</sup>, 18 requests were received by the OPVT in 2024, on the following types of cases:

Number of requests received	Type of case	Provider concerned
15	account suspension, account deletion	Meta
2	content moderation	Wikimedia
1	YouTube channel deletion	Google

For Meta, in 2024, dispute settlement was hampered by difficulties in communicating with the provider and issues related to the conclusion of the cooperation agreement required by Meta. In five cases, requests were rejected without examining the merits of the case for the following reason(s): prior procedural requirement not deemed to be exhausted, failure to comply with the request for further information, late submission of applications. In one case, the procedure was closed on the grounds that the respondent was not covered by the DSA.

Number of cases	Decision
12	ongoing, no decision taken in 2024
1	terminated
5	rejected without examination on the merits

Pursuant to Section 13(2) of the IIS Act, the President of 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 NMHH's website at <https://nmhh.hu/szakmai-erdekeltek/kozvetito-szolgalatok-felugyelete/peren-kivuli-vitarendezeesi-testuletek>.

## 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 DSC 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 and expertise).

### **Award of the status of 'trusted flagger' in 2024**

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>4</sup>.

<sup>3</sup> The OPVT's annual report: [https://opvt.hu/dokumentum/251672/OPVT\\_eves\\_jelentes\\_2024.pdf](https://opvt.hu/dokumentum/251672/OPVT_eves_jelentes_2024.pdf).

<sup>4</sup> NMHH Decree 7/2024 (VII.31.) on the Rules Applicable to Trusted Flaggers: <https://njt.hu/jogszabaly/2024-7-20-3H>.



In 2024, the President of the NMHH certified the Internet Hotline<sup>5</sup> as a trusted flagger under Article 22 of the DSA for the detection of potentially illegal content, on 25 October 2024.

The Internet Hotline (IH) is an online information and assistance service carrying out a public interest mission that joined INHOPE, the international association of hotlines against online sexual exploitation of children.

Online content considered to be illegal or harmful can be reported to the IH in eight categories:

- content published without consent,
- online child sexual abuse/child pornography,
- online harassment,
- racist content, content that incites hatred against a community,
- content promoting or encouraging the use of illegal psychoactive substances,
- content inciting or promoting violent conduct,
- phishing content,
- other content harmful to minors.

According to the IH's annual report on activities in 2024 under the DSA<sup>6</sup>, 398 reports were received between 25 October 2024 and 31 December 2024, of which the IH contacted the hosting service providers concerned in 65 cases. In 40 cases (62% of requests), the hosting provider took action, while for the remaining 25 requests, the IH's procedure was unsuccessful, meaning that no response was received from the relevant hosting service provider.

Pursuant to Section 14(1) of the IIS Act, the President of 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 NMHHs website at <https://nmhh.hu/szakmai-erdekeltok/kozvetito-szolgaltatok-felugyelete/megbizhato-bejelentok>.

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

### ***Introduction***

Upon a reasoned request from the DSC of establishment, vetted researchers shall be provided access to non-public data of VLOP and VLOSE 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,

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<sup>5</sup> The Internet Hotline's website: <https://english.nmhh.hu/internethotline/>.

<sup>6</sup> The Internet Hotline's annual report for 2024 under the DSA: [https://english.nmhh.hu/article/251621/Information on the Internet Hotline in the context of the Digital Services Act DSA](https://english.nmhh.hu/article/251621/Information%20on%20the%20Internet%20Hotline%20in%20the%20context%20of%20the%20Digital%20Services%20Act%20DSA).

the dissemination of illegal content or negative effects for the exercise of fundamental rights, such as the right to freedom of expression.

Upon a duly substantiated application from researchers, provided that the researchers demonstrate that they meet the conditions of the DSA, the DSC of establishment of the VLOP/VLOSE provider shall grant such researchers the status of 'vetted researcher' for the research referred to in the application. VLOP/VLOSE providers shall grant access to the data concerned to vetted researchers.

### ***Award of the status of 'vetted researcher' in 2024***

Given that the relevant delegated act<sup>7</sup> of the European Commission was not adopted until the end of 2024, no vetted researcher status was awarded in the European Union in 2024.

At the same time, the NMHH participated in a pilot project organised by the European Commission with the involvement of some European researchers and in the activities of the working group on data access of the European Board for Digital Services.

## **7. Implementation**

### ***Introduction***

The DSA sets out a range of new obligations for intermediary service providers, with one of the NMHH's key priorities in 2024 being the monitoring of such obligations.

### ***Official activities in 2024***

In 2024, the NMHH continued to engage with intermediary service providers and their representative bodies. It organised bilateral consultations and workshops in order to contribute to the compliance of the providers concerned by building partnerships. The NMHH also supported operators in complying with the transparency requirements of the DSA. From the nearly 40 online platforms operated by providers other than micro and small enterprises identified in 2024, the NMHH entered 13 online platforms in the EU Transparency Database<sup>8</sup> and checked whether the providers concerned published the number of average monthly recipients of their services in the EU.

### ***Other activities in 2024***

In July 2024, the Authority reinforced its cooperation with the Hungarian Competition Authority (GVH), including to increase the efficiency of its work in the digital services market.

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<sup>7</sup> The delegated act is available online at <https://digital-strategy.ec.europa.eu/en/library/delegated-act-data-access-under-digital-services-act-dsa#:~:text=The%20Commission%20has%20adopted%20a%20delegated%20act%20outlining,researchers%20to%20publicly%20available%20data%20on%20their%20platforms.>

<sup>8</sup> The DSA Transparency Database is available at <https://transparency.dsa.ec.europa.eu/>

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.

### ***International activities***

In accordance with the provisions of the DSA, work started in the European Board for Digital Services ('the Board'), bringing together DSCs in February 2024, and in a total of eight working groups of the Board in autumn 2024. The NMHH attended all ordinary and extraordinary meetings of the Board and took an active role in all of the Board's working groups.

## **8. Conclusions**

Most of the intermediary service providers concerned, established in Hungary, were prepared for the entry into application of the DSA in 2024. In the reporting period, the NMHH, as DSC, did not consider it necessary to initiate proceedings against any Hungarian provider under the DSA. NMHH monitors the market players concerned and their compliance with certain obligations under the legislation and, if necessary, enforce compliance in the manner set out in the legislation (by way of official controls or procedures). NMHH seeks to provide information to intermediary service providers about their obligations both on its website and through workshops. At the same time, the NMHH considers it very important to enhance the general public's awareness of the potential benefits of the DSA and therefore endeavours to provide as much information as possible in 2025 to help users be better prepared to exercise their rights in the digital space.