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THE EFFECTS OF MICROTARGETING ON THE (IN)EQUALITY OF VOTING RIGHTS

Abstract: The principle of equal voting rights is one of the foundational pillars of all democratic systems. Yet, pure electoral equality is almost impossible to put into practice. The structure of the electoral system inevitably affects the actual value of a vote. For example, differences in constituency sizes, electoral thresholds, and seat allocation formulas determine how much real weight each individual voter carries.

The rapid evolution of political digital marketing has further increased the potential inequalities between voters. Through microtargeting, political actors can precisely identify and segment voters, and reach them with tailored messages. They can direct their resources toward voters they consider strategically valuable, while ignoring those they deem electorally irrelevant. The question must be asked: does this modern democratic process still treat all voters as equally important?

The European Union addressed the issues of microtargeting through the Regulation on the transparency and targeting of political advertising. Following the regulation's implementation, platforms such as Meta and Google restricted political advertising across the EU. Still, the inequality risks have not gone away. Microtargeting may return in some form in the future, and pose further challenges for the EU. Meanwhile, microtargeting

continues to operate freely in countries outside the EU, for example Serbia, the United States, and Australia.

This article employs a normative and comparative legal analysis, examining the EU regulatory framework alongside practices in selected non-EU countries. The findings suggest that as long as microtargeting exists, the equality of voting rights will always be vulnerable.

Keywords: *Microtargeting; Voting Equality; Political Advertising; Digital Democracy; Electoral Rights*

1. INTRODUCTION

Digital technologies have significantly changed the way democratic processes function and how political actors communicate with voters. One of these technologies is political microtargeting, which is capable of excluding certain groups from political communication, and even suppressing voter turnout. This can create voting inequality. While it is common for democratic electoral systems to produce situations in which some votes carry more weight than others, the hypothesis of this paper is that political microtargeting creates a different and more harmful form of voting inequality. Unlike inequalities arising from electoral system design, it is not produced by state-sanctioned electoral rules but by private actors who differentiate between voters on the basis of their individual characteristics.

To understand the distinction between these two inequalities, the first part of the paper discusses some of the causes of state-sanctioned democratic disproportionality and potential voter inequality, including seat allocation methods, electoral thresholds, and malapportionment. In the second part, the paper explains the concept of political microtargeting and analyses two principal forms of inequality it can produce. The first form is intentional exclusion of particular groups of voters from campaign messages; the second is intentional discouragement of electoral participation through voter suppression techniques.

The third part of the paper examines the current legal framework within the European Union which regulates political microtargeting i.e. the 2016 GDPR and the 2024 Regulation on the transparency and targeting of political advertising. It then offers a comparison with selected non-EU jurisdictions, namely the United States, Australia, and Serbia. Finally, the paper concludes that the lack of proper national regulation undermines

these countries' ability to govern the issue, placing them under the authority of social media platforms' self-regulated microtargeting policies.

2. State-sanctioned democratic disproportionality

According to Dahl (1998), one of the criteria for a democratic process is voting equality. Citizens should have an equal and effective opportunity for voting, and all votes must be counted as equal (p. 37-38). When those votes are translated into parliamentary seats, they should be represented to a degree reasonably proportional to the distribution of votes (Bochsler et al., 2024, p. 1). However, that is not always the case. According to Pierzgalski (2018), when creating proportional representation systems, electoral engineers need to balance and compromise between two competing objectives: minimizing electoral disproportionality and preventing excessive fragmentation of the party system in a parliament (p. 205-206). Different systems can create discrepancies between the number of votes a particular political party receives and the number of seats it wins.¹ As a result, the discourse often centres on the perceived injustice of parties obtaining fewer seats than their level of electoral support should yield in a fully proportional framework (Van der Hout & McGann, 2009, p. 618).

The disproportionality of seat allocation has a side effect of indirectly affecting voter equality. If strict proportionality is not guaranteed, the electoral process becomes a zero sum game with groups of citizens whose votes carry greater weight than those of others. While these disproportionalities are a complex topic that deserves more detailed research, it is useful to briefly touch upon some of the causes of disproportionality. This allows for a comparison with the potential disproportionalities created by political microtargeting.

Firstly, the electoral system itself can be designed in a way that favors disproportionality. There are many different voting systems that can produce substantially different electoral outcomes (O'Neill, 2006, p. 333). Since the 1990s, many democracies have adopted electoral systems that incorporate various institutional constraints affecting the degree of proportional representation in parliament (Bochsler, Hänni, & Grofman, 2024, p. 10). Zuiderveen Borgesius et al. (2018) explain that majoritarian

¹ This topic received much scholarly interest. Pierzgalski (2018) gives an overview of earlier scholarship on electoral disproportionality, including works by Balinski and Young (1977), Benoit (2000), Best and Zhirnov (2015), Blais and Massicotte (2002), Carey and Hix (2011), Farrell (2011), Gallagher (1991), and others.

electoral systems in the UK and US are based on a ‘winner-takes-all’ principle, making some votes more valuable than others (p. 91). The Electoral College in the US system grants the possibility for a candidate to lose the popular vote, but still win the election. For instance, this happened to Al Gore who lost to George W. Bush in 2000 (O'Neill, 2006, p. 328), and to Hillary Clinton who won the 2016 popular vote, but still lost the election to Donald Trump (National Archives and Records Administration, 2026). Moreover, democracies may choose between different seat allocation methods. For example, the d'Hondt method benefits larger parties and produces high levels of disproportionality (Pierzgałski, 2018, p. 216).

Furthermore, most democracies have implemented an electoral threshold, a minimum percentage of votes that parties need to receive before they can win any seats in parliament. While electoral thresholds lower party fragmentation and increase governability, votes cast for lists that do not reach the required electoral threshold (usually between 0 and 6%) are wasted (Delemazure, Freeman, Lang, Laslier, & Peters, 2025, p. 2). Consequently, those votes do not contribute to seat allocation.

Democracies can even combine different approaches to thresholds and proportionality to reach unique results. Kalandrakis & Rueda (2020) give a theoretical example of one system imposing a threshold that forbids smaller parties from entering the parliament, but at the same time giving proportional allocation for eligible parties. Another system may allow even the smallest parties to win a seat, but at the same time grant marked seat advantages to larger parties (Kalandrakis & Rueda, 2021, p. 102).

Finally, most democratic countries have a voting system in which members of parliament are elected directly by the voters in electoral districts. In such systems proportionality should be the fundamental principle of apportionment (Kóczy & Sziklai, 2018, p. 324). However, problems with malapportionment can still arise. Monroe (1994) defines malapportionment as “the discrepancy between the shares of legislative representation and the shares of population held by geographical units” and explains that it “occurs when geographical units have shares of legislative seats that are not proportional to their shares of population” (p. 138). This in turn causes inequality in the weight of individual votes.

In sum, the goal of a democratic electoral system should be the accurate representation of citizens' preferences while at the same time preventing the excessive fragmentation that may lead to ungovernability (Pierzgałski, 2018, p. 206). Two important points need to be stressed out here. Firstly, every electoral system is sanctioned by the country. Even if it creates a situation in which some votes count more than others, it is a consequence of

the state's regulatory activity. Secondly, van der Hout and McGann (2009) argue that the degree to which a vote counts in a modern democracy does not depend on the individual characteristics of the voter, but on the distribution of opinion in the constituency in which that voter lives (p. 624). Inequality caused by political microtargeting differs in both ambits. It is primarily created by private political actors' rules and practices. Moreover, political microtargeting relies heavily on voters' individual characteristics when determining how political messages are distributed. These features are analysed in the following chapter.

3. Definition of political microtargeting

Bennett (2016) argues that modern political campaigns are data-driven, capturing and consolidating data to construct detailed profiles and categories of individual voters. He further notes this practice originated and developed in the US, before spreading to political systems around the world, including those in Europe (p. 261). Political microtargeting drew widespread attention in 2016 after it was used during the Brexit referendum and the US presidential election (Shalevska, 2024, p. 51).

Categorization of individuals has its roots in marketing, where experts tend to assume that groups with similar cultural backgrounds, perspectives and means share similar patterns of behaviour, social values, expectations, etc. Such categorization can be translated to politics to try and infer which political issues different groups of people might be interested in (Bennett, 2016, p. 263). Harvesting and analysing voters' data has vastly improved in the 21st century with the rapid rise of social media platforms and data broker services. Social media platforms collect data on users' demographics, interests, online behavior, and connections (Nott, 2020, p. 7). Using a psychographic framework, voters can be segmented into individual categories based on personality traits (Dowling, 2025, p. 66).

Once different categories of voters have been defined, they can be targeted with political messages. Brkan (2020) identifies 4 different methods of targeted messaging: "parties can send either A) general or B) specific messages to all voters, C) general messages to specific voters or D) specialised messages to specific voters" (p. 775). The most impactful version of targeting is the last one, where specific voters see tailored messages according to their interests. Political microtargeting is based on the assumption that persuasive messages are more effective when delivered to the right recipients (Moniz, Endres, & Panagopoulos, 2026, p. 1). In other words, microtargeting reaches its goal when it finds a match between a

message and its recipient (Noetzel, Stubenvoll, Binder, & Matthes, 2026, p. 161). Zuiderveen Borgesius et al. (2018) provide the example of political parties communicating their stances on family support directly to families and their stances on student financial assistance directly to students (p. 83).

Noetzel et al. (2026) describe political microtargeting as an algorithmic persuasion strategy (p. 157). According to Dowling (2025) this strategy has 3 important elements: A) data collection; B) segmentation and profiling of voter groups; C) sending tailored messages to these voter groups (p. 65). Dobber et al. (2019) argue that the time and effort required to create tailored messages is much lower than in traditional media (television, radio, newspaper), and thus the variations in messages sent to different groups of voters can be enormous (p. 3). Islam (2025) provides the example of a microtargeted anti-vaccination advertisement in which different messages are tailored to different demographic groups, emphasizing that "vaccine passports are oppression" when targeting older adults and claiming that "vaccines are dangerous for pregnant women" when targeting women of reproductive age (p. 29269). Rhum (2021) notes that "tailored psychological targeting can help some consumers make better decisions, but it also can be used to exploit individual vulnerabilities, generating concerns over consumer manipulation" (p. 1834).

Political microtargeting can achieve many different objectives such as informing, persuading, and mobilising certain voter groups, but also confusing, dissuading, and demobilising other voter groups (Dobber et al., 2019, p. 2). Consequently political microtargeting can be viewed as a double-edged sword (Islam, 2025, p. 29269), and it can pose a risk for fundamental rights (Brkan, 2020, p. 776). Decker (2025) argues that political marketing can limit open discussion and interchange of opinions, and ultimately decrease trust in democracy (p. 87). According to Tiazhkorob (2024), "voters frequently encounter content deliberately designed to mislead, polarize society, or influence the political choices based on their personal psychological characteristics" (p. 25). Voters may be exposed to misinformation, demobilisation, and information asymmetries (Noetzel et al., 2026, p. 158). These practices can distort voters' decision-making and threaten electoral integrity (van Gils, Müller, and Prüfer, 2026, p. 3), but also contribute to inequality among voters.

4. Forms of inequality created by political microtargeting

4.1. Diproportional targeting

According to Brkan (2020), “in traditional media political messages are displayed in an equal manner to the entire electorate, who can freely choose whether to consume information from this or another media source” (p. 777). This is not the case with political microtargeting where several important limitations may apply. Firstly, social media platforms can create limitations in the form of ‘digital gerrymandering’. Zittrain (2014) defines digital gerrymandering as “the selective presentation of information by an intermediary to meet its agenda rather than to serve its users” (p. 336). Rhum (2021) notes that digital gerrymandering has become a reality, and discusses a study that showed Facebook preferentially delivering political ads to users that it identified as most relevant (most politically aligned with the ad) (p.1846). While this practice makes it cost-effective for political actors to market themselves on Facebook, it also excludes other voter groups from seeing the message. Rhum (2021) concludes that gerrymandering occurred because Facebook prioritised its own agenda of boosting profits rather than serving users (p. 1846).

Secondly, political actors can also considerably limit access to political information of potential voters, leaving them without important information on political candidates (Brkan, 2020, p. 776). Political actors can deliberately choose to target or exclude voters belonging to certain groups (Rhum, 2021, p. 1846). This can cause voter inequality and can be achieved in two different ways. The first is for political actors to ignore whole voter groups they deem unimportant (Dobber et al., 2019, p. 4). The second is by intentionally targeting voters of other parties and performing voter suppression. We proceed with the analysis of the first method, while the later tactic will be tackled in the next subchapter.

With the first tactic, political actors can choose to only target voters whom they believe will be receptive to campaign communication (Moniz et al., 2026, p. 2). Fathaigh et al. (2021) note that political actors can try to “change the behaviour only of population segments especially likely to engage in a particular activity or politics” (p. 863). While such differentiation can potentially create inequality between voter groups, it is probably the least harmful microtargeting activity. A more radical subset of such communication is employing a type of dog whistle where political actors share a “provocative position only to sympathetic audiences, while remaining invisible to others” (Rhum, 2021, p. 1847).

Political actors may also ignore certain groups of voters for less benign reasons. Borgesius et al. (2018) identify several groups that political actors may choose not to target, including people living in areas where they are already expected to win, people who are not expected to vote, and people who are not interested in politics. They conclude that, as a result, these groups may be underrepresented in democracy (p. 88).

Political actors can also disproportionately target voters in key locations. For example, in US presidential elections, there are specific states that can decide entire elections because they can swing from one side to the other. Therefore, votes in those states carry greater electoral weight than votes in states where the outcome is already settled before the election (Zuiderveen Borgesius et al., 2018, p. 91). A similar example of disproportionate political advertising occurred in the 2015 UK general elections where the conservatives identified and microtargeted 100 key marginal constituencies likely to sway the election (Bennett, 2016, p. 271).

4.2. Voter suppression

The second microtargeting tactic aims at voter suppression and, in our view, results in much more harmful voter inequality. Kim et al. (2026) define voter suppression as a “strategy that demobilizes, discourages, or prevents specific segments of the population from voting” (p. 3). Political actors can do so by deliberately demobilizing supporters of competing parties (Dobber et al., 2019, p. 4). Shalevska (2024) notes that political actors may discourage citizens from voting by using emotionally charged messages designed to bypass critical thinking and influence electoral behaviour (p. 52).

Voter suppression via political microtargeting has been well documented. Kim et al. (2026) share an example: during the 2016 US presidential elections there have been political ads aimed at the black population with the following message: ‘No one represents black people. Don’t go to vote.’ (p. 1). During the same election, the Trump campaign also targeted voters likely to support Clinton with ads that included disinformation and misleading messaging intended to discourage voters from voting for Clinton. In addition, there appear to be elements of possible racial discrimination, namely, voters of colour were twice as likely to be selected and targeted with these deterrence campaigns (Seybold, 2025, p. 4). Kim et al. (2026) describe another example of voter suppression during those elections involving an individual from Florida who operated an account disguised as a Hillary Clinton campaign and ran an ad with the

message: ‘Avoid the line. Vote from home’ (p. 1). Seybold (2025) notes the ad notified voters to vote via text and it had several features that helped boost its credibility (e.g. featuring the Clinton campaign logo) (p. 3). Voting via text is not a valid method of voting in the US, the goal of that ad was to confuse voters into not exercising their right to vote.

Kim et al. (2026) note that during those elections there was a tangible difference in voter turnout between white and non-white voters which they partly attribute to geo-racially targeted voter suppression ads (p. 6). Other authors have also argued that digital voter suppression tactics are used disproportionately against people of colour, especially Black voters.² Seybold (2025) mentions an example of a Republican candidate who during 2018 midterm elections ran an ad that warned the voters they need to provide evidence of US citizenship in order to register to vote. Kansas removed such requirements several months prior to elections. Seybold argues that the goal of the ad was racially targeted suppression because prospective voters of colour are less likely to have such forms of citizenship documentation (p. 4). Kim et al. (2026) note that similar voter suppression tactics have been documented in the 2020, as well as the 2024 US presidential elections (p. 1).

It is worth noting that political microtargeting can have severe consequences. Political microtargeting makes it possible to suppress, deter or completely ignore entire subsets of the population. Rhum (2021) concludes that as a result, certain voters are discouraged from voting or purposefully underinformed and underrepresented in the democratic process (p. 1847). Dowling (2022) notes that voter suppression methods erode key axioms central to democratic decision-making: participation, pluralism and enlightened understanding (p. 238). Kim et al. (2026) suggest this can indicate an unequal distribution of representation in the most fundamental form of democratic participation (p. 8). Also, voter suppression is based on a voter’s characteristics, or predicted political alignment. Seybold (2025) argues that such practices violate not only an individual’s right to vote but also the right to equal treatment (p. 7).

5. Legal regulation of political microtargeting

The potential dangers of political microtargeting to the health of democracy, particularly through voter suppression and the manipulation of voters’ preferences, are well documented. Consequently, we believe that

² Seybold (2025) mentions works by (Bond, 2020 ; Popken, 2020; Ryan-Mosley, 2020)

democracies require strong regulatory mechanisms to protect voter equality against specific threats demonstrated in the previous chapter. While a total ban on political microtargeting could mitigate these risks, it would also have unintended consequences by reducing the efficiency of voter decision-making (van Gils et al., 2026, p. 2). Political microtargeting offers a number of democratic benefits, and a blanket ban would not necessarily be a net positive for democracies. This paper stresses the need for an adequate public legal regulation. Although privately owned social media platforms (e.g. Google, Facebook and X) have recognised the potential risks of unrestricted microtargeting and offered self-regulatory measures; they certainly cannot adequately substitute for state regulatory intervention (Zuiderveen Borgesius et al., 2018, p. 95).

5.1. The EU regulatory framework

Tiazhkorob (2024) notes that the European Union recognized the need to protect democratic values within the digital environment and implemented its regulatory framework. Currently, the EU has two main legal instruments regulating political microtargeting: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) - GDPR; and Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising (TTPA Regulation).

Dowling (2022) argues that one way to mitigate the harmful effects of political microtargeting is to strengthen data protection laws (p. 240). Therefore, GDPR can be viewed as an instrument that regulates microtargeting indirectly. Article 9 (1) of the GDPR states that “processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a person's sex life or sexual orientation shall be prohibited”. GDPR undoubtedly applies to political parties (Bennett, 2016, p. 266).

Obviously, if listed data is not processed, voters can not be microtargeted on the basis of that data. GDPR would make voter deterrence and suppression of non-white voters that happened in the 2016 US presidential election much harder to achieve. Technically, political actors could still target voter groups with deterring messages, but they would have

to target them based on characteristics other than the ones for which processing is prohibited.

TTPA Regulation incorporates the GDPR's definition of controller (GDPR, Art. 4 (7)) and the prohibition of processing special categories of personal data. It also regulates microtargeting directly. The Regulation permits targeting under the following conditions: the controller has collected the personal data directly from the data subject; the data subject must have given explicit consent for the processing of personal data for political advertising; and the targeting techniques do not use special categories of personal data for profiling. The regulation prohibits targeting individuals who are known with reasonable certainty to be at least one year below the national voting age and requires controllers to make it as easy to refuse or withdraw consent as to give it. Limited exceptions to these rules apply to communications addressed exclusively to members, former members, or subscribers of political organisations (TTPA Regulation, Art. 18). The Regulation also introduces extensive transparency obligations for controllers using targeting or ad-delivery techniques in online political advertising. Controllers must adopt and publish a policy explaining their targeting practices, maintain records of the techniques used, disclose key information about the targeting logic, parameters, categories of personal data, and any use of AI, conduct annual risk assessments of their impact on fundamental rights, and provide users with effective means to exercise their data protection rights, including the right to withdraw consent (TTPA Regulation, Art. 19).

The Regulation on the transparency and targeting of political advertising was a significant step forward when it comes to regulating negative aspects of political microtargeting by putting additional obligations on social media platforms. However, the regulation had an unintended consequence. As a response to newly set obligations, both Meta (parent company of Facebook and Instagram), and Google announced they were ending political advertising on their platforms (Meta, 2025; Google, 2025). Since then, political actors in EU countries have fewer opportunities to advertise online. In non-EU jurisdictions, political advertising on Facebook and Google will continue without afore-explained limitations.

5.2. Legal framework in selected non EU jurisdictions: USA, Australia, and Serbia

Before the adoption of the TTPA Regulation, the national regulatory frameworks of EU Member States consisted primarily of data protection

law, general electoral law, and rules governing advertising in traditional media, which proved insufficient to address the challenges posed by political microtargeting. The European Union has gone further than individual jurisdictions by introducing a harmonised supranational regulatory framework specifically addressing political microtargeting. This supranational approach is especially important in the context of elections to the European Parliament, which involve a common democratic process across all Member States. Non-EU countries that lack a regulatory framework comparable to the TTPA Regulation and regulate microtargeting only indirectly through their respective data protection laws continue to face some similar regulatory challenges. In the absence of dedicated legislation, the political actors in those countries are subject to the internal rules of social media platforms regarding political microtargeting.³

The examples were selected to illustrate three different approaches to regulating the collection and processing of personal data: the USA lacks a comprehensive federal framework; Australia regulates personal data but exempts political parties; while Serbia applies its data protection framework without such an exemption.

According to Bennett (2016), the USA has historically been more tolerant of practices to monitor and profile the electorate, and use of marketing techniques. Any regulation that would regulate the flow of private information for political campaign purposes would have to directly confront the First Amendment (p. 262). Due to its unique political and social conditions (Bennett, 2016, p. 274), the First Amendment currently limits data-privacy reform (Rhum, 2021, p. 1829), which explains why the USA lacks a general data protection law (Zuiderveen Borgesius et al., 2018, p. 90). In other words, there is neither a federal law equivalent to GDPR nor a federal framework that regulates political microtargeting.

Dowling (2025) notes that Australia does not have legislation specifically regulating political microtargeting, although the Australian Privacy Act provides some rules relevant to the practice (p. 77). The Act regulates the collection and processing of personal information by relevant entities, which is crucial for microtargeting (p. 69-70). It also pushes for de-identification of personal information. However, political parties are exempt

³ The existing literature does not provide a comprehensive overview of the regulation of political microtargeting across all jurisdictions. Instead, most studies focus either on a single country's regulatory framework or on comparative analyses of a limited number of jurisdictions. For broader discussions of different regulatory approaches, see Dobber et al. (2019); van Drunen, Helberger, and Ó Fathaigh (2025); International IDEA (2020); OECD (2024); Kröger et al. (2024); and Cavaliere et al. (2021).

from the act and remain free to collect and use voter's personal data (p. 78). This creates a unique regulatory framework: social media platforms are subject to the act, while political parties, who are the primary actors engaging in political microtargeting, are exempt from it.

Similarly to the USA and Australia, Serbia does not have legislation specifically regulating political microtargeting. Its framework focuses mostly on collection and processing of personal data. DLA Piper (2026) notes that Serbia enacted a new Data Protection Law in 2018, which is largely harmonized with the EU's GDPR. Compared to Australia, Serbia offers a stricter legal framework because political parties are not exempt from its data protection rules.

CONCLUSION

Modern democracies often tolerate certain forms of unequal electoral impact: electoral thresholds, different voting systems, seat allocation formulas, and malapportionment create situations in which some votes carry greater weight than others. However, these inequalities usually arise from rules adopted and sanctioned by the state. Moreover, they apply generally and impersonally. The inequality usually does not stem from individual psychological, demographic, behavioural, or political characteristics of voters. Political microtargeting can create a different kind of inequality. This inequality is not a result of a country's public electoral rules, but of private political actors and social media platforms using voter data to divide voters into categories. Another important distinction is that these categories are based on personal characteristics, like preferences, geographic location, behaviour, vulnerabilities, and predicted political alignment.

Inequality created by political microtargeting can appear in two main forms. Firstly, political actors may simply exclude certain groups from campaign communication. Voters considered irrelevant, unpersuadable, politically inactive, or located in electorally unimportant areas may receive little or no political information. Secondly, and more seriously, political actors may target specific groups with messages designed to deter or suppress their participation and turnout. Both practices undermine the idea that citizens should have an equal opportunity to participate in the democratic process.

The European Union has responded to these risks through the GDPR and Regulation on the transparency and targeting of political advertising. These acts do not eliminate political microtargeting, but they limit the use of personal data, requiring explicit consent, prohibiting certain forms of

profiling, and imposing transparency obligations. In the examined non-EU jurisdictions, regulation focuses on data collection and processing, rather than on microtargeting itself. The USA lacks a federal GDPR-equivalent and a specific framework for political microtargeting; Australia regulates personal information but exempts political parties; Serbia has GDPR-like data protection rules, but no specific microtargeting legislation. The danger of such a regulatory gap is that the regulation of political microtargeting is left largely to self-imposed rules adopted by social media platforms, rather than to national legislation. Consequently, voters in these jurisdictions may not enjoy the same level of protection against voter inequality resulting from political microtargeting as voters within the EU. Adopting dedicated legislation similar to the TTPA Regulation could contribute to strengthening electoral equality and democratic processes in these jurisdictions.

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