KEY THEME[1]
Article 8
The right to private life protecting or limiting the role of "public watchdogs"

(Last updated: 31/08/2026)

Introduction

The Court has accepted that there are different types of "public watchdogs". The press has been identified as such early on (*Barthold v. Germany*, 1985, § 58), this role having been recognised with regard to professional (for instance, *Pedersen and Baadsgaard v. Denmark* [GC], 2004, § 71) as well as non-professional journalists (*Falzon v. Malta*, 2018, § 57, where this role was attributed to a retired politician who was a regular opinion writer in weekly publications).

In addition, NGOs have been recognised as "public watchdogs" when they draw attention to matters of public interest (*Vides Aizsardzības Klubs v. Latvia*, 2004, § 42; *Animal Defenders International v. the United Kingdom* [GC], 2013, § 103 ; *National Youth Council of Moldova v. the Republic of Moldova*, 2024, § 73). An NGO is exercising a "public watchdog" role of similar importance to that of the press and may be characterised as a social "watchdog" warranting similar protection under the Convention as that afforded to the press (*Magyar Helsinki Bizottság v. Hungary* [GC], 2016, § 159; *Margulev v. Russia*, 2019, §§ 47-48; *Association Burestop 55 and Others v. France*, 2021, § 88).

The role of bloggers/popular users of social media may also be considered to be "public watchdogs" in so far as the protection afforded by Article 10 is concerned (*Magyar Helsinki Bizottság v. Hungary* [GC], 2016, § 168; *Falzon v. Malta*, 2018, § 57; *Centre for Democracy and the Rule of Law v. Ukraine*, 2020, § 87). Similar principles were applied to an election observer (*Timur Sharipov v. Russia*, 2022, §§ 26 and 35). On the other hand, lawyers have not been considered to come under this category (*Studio Monitori and Others v. Georgia*, 2020, § 42; contrast *Străisteanu v. the Republic of Moldova*, 2025, § 71, where the applicant, a lawyer and well-known LGBTQ+ rights activist whose Facebook page had a significant following, was assimilated to a public watchdog).

This Key Theme describes how the right to privacy can protect and limit the vital role of those 'public watchdogs'. On the one hand, the right to privacy can shelter a watchdog from arbitrary interferences by the State. On the other, it can limit their activities given the rights and freedoms of others and, indeed, the general interest. Relevant in this latter aspect are the "duties and responsibilities" of a public watchdog (for the duties and responsibilities of journalists, see for example *Pentikäinen v. Finland* [GC], 2015, §§ 88-91; *Amaghlobeli and Others v. Georgia*, 2021, § 39; *Milosavljević v. Serbia (no. 2)*, 2021, § 65; *Stancu and Others v. Romania*, 2022, § 111; and for ethical journalism considerations applying to NGOs, see *Magyar Helsinki Bizottság v. Hungary* [GC], 2016, § 159, and *Medžlis Islamske Zajednice Brčko and Others v. Bosnia and Herzegovina* [GC], 2017, § 87).

States are obliged by their positive obligations under Article 8 of the Convention to regulate the exercise of freedom of expression so as to ensure adequate protection by law of individuals' reputation; but they must not do so in a manner that unduly deters the media from fulfilling their "public watchdog" role (*Atamanchuk v. Russia*, 2020, §§ 66 and 70).

[1] Prepared by the Registry. It does not bind the Court.

The Court has therefore developed guiding principles as to how to strike the right balance between the relevant competing rights and interests. Articles 8 and/or 10 are invoked depending on the particular applicant and their complaint. This Key Theme focuses on cases brought before the Court under Article 8, under both Articles 8 and 10 (when relevant) and under certain other Articles (*idem*).

Principles drawn from the current case-law

Surveillance of communication:

- The law must provide safeguards appropriate to powers of surveillance of journalists, such as interception and recording of their telecommunications with a view to discovering their sources (*Telegraaf Media Nederland Landelijke Media B.V. and Others v. the Netherlands*, 2012, § 102 – violation of Articles 8 and 10).
- Secret surveillance might have an impact on the watchdog activities of NGOs (*Szabó and Vissy v. Hungary*, 2016, § 38 – violation of Article 8).
- Certain cases, in which the Court assessed secret surveillance regimes in general without referring specifically to watchdogs, were in fact introduced by watchdogs (*Association for European Integration and Human Rights and Ekimdzhiev v. Bulgaria*, 2007, § 69 – violation of Article 8; *Liberty and Others v. the United Kingdom*, 2008, § 57 – violation of Article 8; *Roman Zakharov v. Russia* [GC], 2015, § 175-179 – violation of Article 8; *Centrum för rättvisa v. Sweden* [GC], 2021 – violation of Article 8 (bulk interception of communications and intelligence sharing); *Big Brother Watch and Others v. the United Kingdom* [GC], 2021 – violation of Article 8 and Article 10 (bulk interception regime and acquisition of communications data from communications service providers), no violation of Article 8 and Article 10 (receipt of intelligence from foreign intelligence services).

Search of a journalist's home/workplace; seizure of journalist's material:

- The case-law on the obligation to protect one's home (*Ernst and Others v. Belgium*, 2003, § 110) and one's office (*Ernst and Others v. Belgium*, 2003, § 110 – violation of Articles 8 and 10; *Saint-Paul Luxembourg S.A. v. Luxembourg*, 2013, § 39 – violation of Articles 8 and 10) has been applied to journalists.
- Searches conducted in the office of the journalist's lawyer may violate Article 8 and also have a bearing on the journalist's rights under Article 10 of the Convention (*Roemen and Schmit v. Luxembourg*, 2003, § 71 – violation of Articles 8 and 10).
- Any search involving the seizure of data storage devices belonging to a journalist raises a question of the journalist's freedom of expression (including source protection) and access to the information contained therein must be protected by sufficient and adequate safeguards against abuse (*Nagla v. Latvia*, 2013, § 101 – violation of Article 10, no separate examination under Article 8 deemed necessary).
- Seizure of a journalist's communications data must be justified by an overriding requirement in the public interest: vital interest in obtaining such data, whether reasonable alternative measures for obtaining the information sought and a legitimate interest in the disclosure clearly outweighing the public interest in the non-disclosure (*Sedletska v. Ukraine*, 2021, § 70 – violation of Article 10).
- Bulk interception regimes may have repercussions on confidential journalistic material under Article 10. In this regard, the Court distinguishes between *intentional* access to such material, for example, through the deliberate use of a strong selector connected to a journalist or where there is a high probability that such material will be selected for examination as a result of such selectors, and *unintentional* access as a "bycatch" of such an operation (*Big Brother Watch and Others v. the United Kingdom* [GC], 2021,

§§ 447-450 – violation of Article 8 and 10). As regards intentional access, preventive independent review is required given the significant degree of interference with journalistic communications, commensurate with that occasioned by the search of a journalist's home or workplace: the selectors or search terms have to be authorised by a judge or other independent and impartial decision-making body vested with the power to determine whether they have been "justified by an overriding requirement in the public access" (*ibid.*, § 448). As to non-intentional access, domestic law must contain robust safeguards regarding the storage, examination, use, onward transmission and destruction of confidential material. Moreover, if and when it becomes apparent that the communication or data contain confidential journalistic material, their continued storage and examination should only be possible if authorised by a judge or other independent and impartial decision-making body invested with the power to determine whether continued storage and examination is "justified by an overriding requirement in the public interest" (*ibid.*, §§ 449-450 and 458).

Investigative journalism and the obligations of the State:

- *Khadija Ismayilova v. Azerbaijan*, 2019: Intrusion into the private life of a well-known investigative journalist (including dissemination on the Internet of secretly filmed videos of her) allegedly committed in connection with her highly critical journalistic activity, and significant flaws in the manner in which the authorities investigated the matter. Complaint examined from the standpoint of the State's positive obligations under Article 8: §§ 113-114. Important to investigate whether the dissemination of the video was connected to the applicant's professional activity and by whom it had been made. Grave acts and an affront to human dignity against a journalist: § 116.

  - Particular private information, obtained during the investigation, referenced in a press release of the Prosecutor's Office (Article 8, private life). The authorities should have exercised care in order not to further compound the existing breach of the applicant's privacy (§ 148).

  - Acts of a criminal nature committed against the applicant apparently linked to her journalistic activity brought to the attention of the authorities. Article 10. Situation "contrary to the spirit of an environment protective of journalism" (§ 165) and failure of the State to comply with its positive obligation to protect the applicant in the exercise of her freedom of expression.

Balancing the right to private life and freedom of expression:

- As a matter of principle rights under Articles 8 and 10 deserve equal respect. The Court considers that the outcome of the application should not, in theory, depend on whether it has been lodged by the person who was the subject of the Article (Article 8) or by the publisher (Article 10) (*Von Hannover v. Germany (no. 2)* [GC], 2012, § 106 – no violation of Article 8). For a recapitulation of general principles concerning the balancing of Articles 8 and 10, see *ibid.*, §§ 95-113.
- In order for Article 8 to come into play an attack on a person's reputation must attain a certain level of seriousness and be carried out in a manner causing prejudice to personal enjoyment of the right to respect for private life (for instance, *Bédat v. Switzerland* [GC], 2016, § 72).
- A fundamental distinction needs to be made between, on the one hand, reporting facts – even controversial ones – capable of contributing to a debate in a democratic society relating to politicians in the exercise of their functions, where the press exercises its vital role of "watchdog" in a democracy and, on the other, reporting details of the private life of

an individual who does not necessarily exercise official functions, and where the press does not exercise such role (*Von Hannover v. Germany*, 2004, § 63 – violation of Article 8; *Von Hannover v. Germany (no. 2)* [GC], 2012, § 110 – no violation of Article 8). In particular, different considerations apply to press reports concentrating on sensational and, at times, lurid news, intended to titillate and entertain, which are aimed at satisfying the curiosity of a particular readership regarding aspects of a person's strictly private life (*M.L. v. Slovakia*, 2021, § 53 – violation of Article 8).

- The Court distinguishes between private individuals and persons acting in a public context, such as political or public figures. Accordingly, whilst a private individual unknown to the public may claim particular protection of his or her right to private life, the same is not true of public figures, in respect of whom the limits of critical comment are wider, as they inevitably and knowingly expose themselves to public scrutiny and must therefore display a particularly high degree of tolerance. This principle applies not only to politicians, but to every person who could be regarded as a public figure, namely persons who, through their acts or even their position, have entered the public arena (*Kajganić v. Serbia*, 2024, § 65).
- The mere fact of having cooperated with the press on previous occasions or an alleged or real previous tolerance or accommodation with regard to Articles touching on private life cannot serve as an argument for depriving the person of the right to privacy. Even when persons have made public some private information about themselves, the manner in which it is subsequently portrayed has to be justified in the circumstances of the case. The person having given interviews does not dispense the State from its positive obligation to protect the person's privacy, as seeking to avail of media to share information in a setting the person has selected cannot, in principle, be held against him or he (*Dupate v. Latvia*, 2020, § 64).
- The Court has accepted that although the publication of news about the private life of public figures is generally for the purposes of entertainment, it contributes to the variety of information available to the public and undoubtedly benefits from the protection of Article 10 of the Convention. However, such protection may cede to the requirements of Article 8 where the information at stake is of a private and intimate nature and there is no public interest in its dissemination (*Dupate v. Latvia*, 2020, § 51).
- The Court has stressed the importance of assessing the contribution to a debate of general public interest made by images published in the press, particularly when these have been taken covertly and the applicant is not known to the public (*Hájovský v. Slovakia*, 2021, §§ 31, 43 and 49-50 – violation of Article 8). It has also pointed out that the "duties and responsibilities" linked with the exercise of the freedom of expression are particularly important in relation to the dissemination to the wide public of photographs revealing personal and intimate information about an individual; and that certain events in the life of a family must be given particularly careful protection and must therefore lead journalists to show prudence and caution when covering them (*Dupate v. Latvia*, 2020, § 59).
- Having regard, among other things, to the chilling effect on the freedom of expression to which it may give rise, Article 8 does not require an obligation to give a personal advance notification prior to the publication of intimate details of his or her private life (*Mosley v. United Kingdom*, 2012, § 132 – no violation of Article 8).
- The disclosure by a journalist of highly personal (including medical) information of an accused person calls for the highest level of protection under Article 8; this is especially important when the accused is not known to the public (*Bédat v. Switzerland* [GC], 2016, § 76 – no violation of Article 10).
- The Court has held that the legal obligation to publish a rectification may be considered a normal element of the legal framework governing the exercise of the freedom of expression by the media. The aim of the right to reply is to afford everyone the possibility

of protecting him or herself against certain statements or opinions disseminated by the mass media that are likely to be injurious to his or her private life, honour or dignity; in other words, the primary objective of the right of reply is to allow individuals to challenge false information published about them in the press (*Axel Springer SE v. Germany*, 2023, §§ 33-34). At the same time, given the high level of protection enjoyed by the press there need to be exceptional circumstances in which a newspaper may legitimately be required to publish, for example, a retraction, an apology or a judgment in a defamation case. In this respect the potential chilling effect of the penalties imposed on the press in the performance of its task as a purveyor of information and public watchdog in the future must also be taken into consideration (*ibid.*, § 33).

- Similarly, media outlets may be ordered to redact certain personal information from online public archives where such information no longer holds any topical, historical, or scientific interest but threatens to inflict serious harm to the reputation of the applicant. In such circumstances, a "right to be forgotten" falls under the scope of Article 8 (*Hurbain v. Belgium* [GC], 2023, §§ 199 and 255).
- In some cases, the nature and degree of the allegations do not raise an issue under Article 8 but instead only relate to Article 10 and its restrictions; the Court therefore may refuse to engage in a balancing exercise (*Magyar Helsinki Bizottság v. Hungary* [GC], 2016, § 196; see also *Lingens v. Austria*, 1986, § 38; *Centre for Democracy and the Rule of Law v. Ukraine*, 2020, § 116).
- Where the preservation of personal data concerns parties who are deceased access to such data cannot constitute a privacy infringement as "the private life of a deceased person does not continue after death". Alternatively, Article 8 can be invoked to restrict personal data access to such data if the disclosure has a direct and immediate impact on the privacy and life of the immediate family of the deceased. If not then such access should be permissibleArticle (*Suprun and Others v. Russia*, 2024, §§ 96-97).

Watchdogs on the Internet and Article 8:

- The risk of harm posed by content and communications on the Internet to the exercise and enjoyment of human rights and freedoms, particularly the right to respect for private life, is certainly higher than that posed by the press (*Węgrzynowski and Smolczewski v. Poland*, 2013, § 58 – no violation of Article 8).
- For complaints regarding the deletion of material published online, the balancing of the competing interests could result in different outcomes, depending on whether the deletion request was made against the entity which had originally published the information (whose activity was generally at the heart of what freedom of expression was intended to protect), or against a search engine (whose main interest was not in publishing the initial information but in facilitating the identification of all available information about him or her and creating a profile of it) (*M.L. and W.W. v. Germany*, 2018, § 97 – no violation of Article 8).

Noteworthy examples

- *Von Hannover (no. 2) v. Germany* [GC], 2012 – Refusal of domestic courts to issue an injunction restraining further publication of a photograph of a famous couple taken without their knowledge (no violation of Article 8);
- *Roman Zakharov v. Russia* [GC], 2015 – Shortcomings in legal framework governing secret surveillance of mobile telephone communications (violation of Article 8);

- *Roemen and Schmit v. Luxembourg*, 2003 – Search of journalist's home and office with a view to identifying sources, search of lawyer's office and seizure of a letter (violation of Articles 8 and 10);
- *Ernst and Others v. Belgium*, 2003 – Search and seizure in a press context (violation of Article 8);
- *Weber and Saravia v. Germany* (dec.), 2006 – Strategic monitoring of telecommunications interfering with the journalist's freedom of expression but not constituting a serious interference (inadmissible under Articles 8 and 10);
- *Association for European Integration and Human Rights and Ekimdzhiev v. Bulgaria*, 2007 – Lack of sufficient safeguards in a law allowing secret surveillance measures (violation of Article 8);
- *Liberty and Others v. the United Kingdom*, 2008 – Interception by the Ministry of Defence of the external communications of civil-liberties organisations on the basis of a warrant issued under wide discretionary powers (violation of Article 8);
- *Mosley v. United Kingdom*, 2011 – No legal requirement for newspapers to give advance notice before publishing details of a person's private life (no violation of Article 8);
- *Telegraaf Media Nederland Landelijke Media B.V. and Others v. the Netherlands*, 2012 – Surveillance of journalists and order for them to surrender documents capable of identifying their sources (violation of Articles 8 and Article 10);
- *Saint-Paul Luxembourg S.A. v. Luxembourg*, 2013 – Search and seizure operation at newspaper to confirm the identity of the author of an Article (violation of Articles 8 and 10);
- *Węgrzynowski and Smolczewski v. Poland*, 2013 – Courts' refusal to order newspaper to remove Article damaging applicant's reputation from its Internet archive (no violation of Article 8);
- *Szabó and Vissy v. Hungary*, 2016 – Absence of sufficient guarantees against abuse in legislation on secret surveillance (violation of Article 8);
- *M.L. and W.W. v. Germany*, 2018 – Refusal to oblige media to anonymise online archive material about a crime at the request of its perpetrators in view of their imminent release (no violation of Article 8);
- *Khadija Ismayilova v. Azerbaijan*, 2019 – Intrusion into the private life of a well-known investigative journalist allegedly committed in connection with her journalistic activity (violation of Articles 8 and 10);
- *Dupate v. Latvia*, 2020 – publication of covertly taken photographs of partner of a public person leaving hospital with their newborn baby after giving birth (violation of Article 8);
- *Centrum för rättvisa v. Sweden* [GC], 2021 – actual or potential interception in bulk of communications through mobile telephones and mobile broadband by way of signals intelligence (violation of Article 8 – bulk interception of communications and intelligence sharing);
- *Big Brother Watch and Others v. the United Kingdom* [GC], 2021 – scope and magnitude of secret surveillance regimes including bulk interception of communications and intelligence sharing (violation of Article 8 and Article 10 – bulk interception regime and acquisition of communications data from communications service providers; no violation of Article 8 and Article 10 – receipt of intelligence from foreign intelligence services);
- *Hájovský v. Slovakia*, 2021 – flawed assessment by domestic courts of the applicant's privacy rights following newspaper publication of private information and non-blurred images of applicant taken covertly and under pretences (violation of Article 8);

- *Milosavljević v. Serbia (no. 2)*, 2021 – civil judgment against, *inter alia*, the editor-in-chief of a news magazine, for defaming the director of a State-run public utility company (no violation of Article 10);
- *M.L. v. Slovakia*, 2021 – dismissal of action against tabloids, which published unverified tawdry statements on, and pictures of, a priest convicted of sexual offences, years after his death (violation of Article 8);
- *Străisteanu v. the Republic of Moldova*, 2025 – obligation imposed on the applicant, a lawyer and well-known LGBTQ+ rights activist, to remove from her Facebook page videos showing a fellow lawyer making insulting homophobic remarks towards her on the eve of the Pride march (violation of Article 10).

Watchdog role and Article 10 of the Convention

Measures which restrict press freedom and impair the ability of NGOs/press to act as watchdogs will very often be examined under **Article 10**, without any reference to Article 8: only major cases are cited in this Key Theme. Such restrictive measures may also fall to be examined under other Articles in the Convention.

See for example:

- *Lingens v. Austria*, 1986 (violation of Article 10);
- *Animal Defenders International v. United Kingdom* [GC], 2013 (no violation of Article 10);
- *Nagla v. Latvia*, 2013 (violation of Article 10);
- *Pentikäinen v. Finland* [GC], 2015 (no violation of Article 10);
- *Medžlis Islamske Zajednice Brčko and Others v. Bosnia and Herzegovina* [GC], 2017 (no violation of Article 10);
- *GRA Stiftung gegen Rassismus und Antisemitismus v. Switzerland*, 2018 (violation of Article 10);
- *Şahin Alpay v. Turkey*, 2018 (violation of Articles 10 and 5 § 1);
- *Margulev v. Russia*, 2019 (violation of Article 10);
- *Centre for Democracy and the Rule of Law v. Ukraine*, 2020 (violation of Article 10);
- *Baldassi and Others v. France*, 2020 (violation of Article 10);
- *Sedletska v. Ukraine*, 2021 (violation of Article 10);
- *Amaghlobeli and Others v. Georgia*, 2021 (no violation of Article 10);
- *Association Burestop 55 and Others v. France*, 2021 (no violation of Article 10);
- *Hurbain v. Belgium* [GC], 2023 (no violation of Article 10);
- *National Youth Council of Moldova v. the Republic of Moldova*, 2024 (violation of Article 10).

Recap of general principles

- For a recapitulation of general principles concerning the balancing of Articles 8 and 10 see *Von Hannover v. Germany (no. 2)* [GC], 2012, §§ 95-113.

Further references

Council of Europe:

- Resolution 1003 of the Parliamentary Assembly on Ethics of journalism (1993)

- Resolution 1165 of the Parliamentary Assembly of the Council of Europe on Right to Privacy (1998)
- Recommendation No. R (2000) 7 of the Committee of Ministers to member states on the right of journalists not to disclose their sources of information (2000)
- Resolution 2045 (2015) of the Parliamentary Assembly of the Council of Europe on Mass Surveillance (2015)
- Recommendation CM/Rec(2016)4 of the Committee of Ministers to member States on the protection of journalism and safety of journalists and other media actors (2016)
- Resolution 2212 (2018) of the Parliamentary Assembly of the Council of Europe on The protection of editorial integrity (2018)

European Union:

- Google Spain SL, Google Inc. v. Agencia Española de Protección de Datos (AEPD), Mario Costeja González (2014)
- General Data Protection Regulation (2016)

United Nations:

- United Nations General Assembly, Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression (A/HRC/23/40) (2013)

KEY CASE-LAW REFERENCES

Leading cases:

- *Von Hannover v. Germany (no. 2)* [GC], nos. 40660/08 and 60641/08, 7 February 2012 (no violation of Article 8);
- *Axel Springer AG v. Germany* [GC], no. 39954/08, 7 February 2012 (violation of Article 10).

Other cases under Article 8:

- *Roemen and Schmit v. Luxembourg*, no. 51772/99, 25 February 2003 (violation of Articles 8 and 10);
- *Ernst and Others v. Belgium*, no. 33400/96, 15 July 2003 (violation of Article 8);
- *Weber and Saravia v. Germany* (dec.), no. 54934/00, 29 June 2006 (inadmissible under Articles 8 and 10 – manifestly ill-founded);
- *Association for European Integration and Human Rights and Ekimdzhiev v. Bulgaria*, no. 62540/00, 28 June 2007 (violation of Article 8);
- *Liberty and Others v. the United Kingdom*, no. 58243/00, 1 July 2008 (violation of Article 8);
- *Telegraaf Media Nederland Landelijke Media B.V. and Others v. the Netherlands*, no. 39315/06, 22 November 2012 (violation of Articles 8 and 10);
- *Saint-Paul Luxembourg S.A. v. Luxembourg*, no. 26419/10, 18 April 2013 (violation of Articles 8 and 10);
- *Roman Zakharov v. Russia* [GC], no. 47143/06, 4 December 2015 (violation of Article 8);
- *Szabó and Vissy v. Hungary*, no. 37138/14, 12 January 2016 (violation of Article 8);
- *Khadija Ismayilova v. Azerbaijan*, nos. 65286/13 and 57270/14, 10 January 2019 (violation of Articles 8 and 10);
- *Dupate v. Latvia*, no. 18068/11, 19 November 2020 (violation of Article 8);
- *Centrum för rättvisa v. Sweden* [GC], no. 35252/08, 25 May 2021 (violation of Article 8);
- *Big Brother Watch and Others v. the United Kingdom* [GC], nos. 58170/13 and 2 others, 25 May 2021 (violation, no violation of Article 8; violation, no violation of Article 10);
- *M.L. v. Slovakia*, no. 34159/17, 14 October 2021 (violation of Article 8).

Other cases on the balancing of Articles 8 and 10:

- *Von Hannover v. Germany*, no. 59320/00, ECHR 2004-VI (violation of Article 8);
- *Mosley v. the United Kingdom*, no. 48009/08, 10 May 2011 (no violation of Article 8);
- *Magyar Helsinki Bizottság v. Hungary* [GC], no. 18030/11, 8 November 2016 (violation of Article 10);
- *Węgrzynowski and Smolczewski v. Poland*, no. 33846/07, 16 July 2013 (no violation of Article 8);
- *Bédat v. Switzerland* [GC], no. 56925/08, 29 March 2016 (no violation of Article 10);
- *Medžlis Islamske Zajednice Brčko and Others v. Bosnia and Herzegovina* [GC], no. 17224/11, 27 June 2017 (no violation of Article 10);
- *M.L. and W.W. v. Germany*, nos. 60798/10 and 65599/10, 28 June 2018 (no violation of Article 8);
- *Atamanchuk v. Russia*, no. 4493/11, 11 February 2020 (no violation of Article 10);
- *Monica Macovei v. Romania*, no. 53028/14, 28 July 2020 (violation of Article 10);

- *Hájovský v. Slovakia*, no. 7796/16, 1 July 2021 (violation of Article 8);
- *Milosavljević v. Serbia (no. 2)*, no. 47274/19, 21 September 2021 (no violation of Article 10);
- *M.L. v. Slovakia*, no. 34159/17, 14 October 2021 (violation of Article 8).
- *Barthold v. Germany*, no. 8734/79, 25 March 1985, Series A no. 90 (violation of Article 10);
- *Lingens v. Austria*, no. 9815/82, 8 July 1986, Series A no. 103 (violation of Article 10);
- *Vides Aizsardzības Klubs v. Latvia*, no. 57829/00, 27 May 2004 (violation of Article 10);
- *Pedersen and Baadsgaard v. Denmark* [GC], no. 49017/99, 17 December 2004 (no violation of Article 10);
- *Animal Defenders International v. United Kingdom* [GC], no. 48876/08, 22 April 2013 (no violation of Article 10);
- *Nagla v. Latvia*, no. 73469/10, 16 July 2013 (violation of Article 10);
- *Pentikäinen v. Finland* [GC], no. 11882/10, ECHR 2015 (no violation of Article 10);
- *Bédat v. Switzerland* [GC], no. 56925/08, 29 March 2016 (no violation of Article 10);
- *Medžlis Islamske Zajednice Brčko and Others v. Bosnia and Herzegovina* [GC], no. 17224/11, 27 June 2017 (no violation of Article 10);
- *GRA Stiftung gegen Rassismus und Antisemitismus v. Switzerland*, no. 18597/13, 9 January 2018 (violation of Article 10);
- *Falzon v. Malta*, no. 45791/13, 20 March 2018 (violation of Article 10);
- *Şahin Alpay v. Turkey*, no. 16538/17, 20 March 2018 (violation of Articles 10 and 5 § 1);
- *Khadija Ismayilova v. Azerbaijan*, nos. 65286/13 and 57270/14, 10 January 2019 (violation of Articles 8 and 10);
- *Cangi v. Turkey*, no. 24973/15, 29 January 2019 (violation of Article 10);
- *Margulev v. Russia*, no. 15449/09, 8 October 2019 (violation of Article 10);
- *Studio Monitori and Others v. Georgia*, nos. 44920/09 and 8942/10, 30 January 2020 (no violation of Article 10);
- *Centre for Democracy and the Rule of Law v. Ukraine*, no. 10090/16, 26 March 2020 (violation of Article 10);
- *Baldassi and Others v. France*, nos. 15271/16 and 6 others, 11 June 2020 (violation of Article 10);
- *Sedletska v. Ukraine*, no. 42634/18, 1 April 2021 (violation of Article 10);
- *Amaghlobeli and Others v. Georgia*, no. 41192/11, 20 May 2021 (no violation of Article 10);
- *Association Burestop 55 and Others v. France*, no. 56176/18, 1 July 2021 (no violation of Article 10);
- *Timur Sharipov v. Russia*, no. 15758/13, 13 September 2022 (violation of Article 10);
- *Stancu and Others v. Romania*, no. 22953/16, 18 October 2022 (violation of Article 10);
- *Axel Springer SE v. Germany*, no. 8964/18, 17 January 2023 (no violation of Article 10);
- *Hurbain v. Belgium* [GC], no. 57292/16, 4 July 2023 (no violation of Article 10);
- *Suprun and Others v. Russia,* nos. 58029/12 and 4 others, 18 June 2024 (violation of Article 10).
- *Kajganić v. Serbia*, no. 27958/16, 8 October 2024 (no violation of Article 8);
- *Străisteanu v. the Republic of Moldova*, no. 9989/20, 5 June 2025 (violation of Article 10);
- *Charki v. France*, no. 28473/22, 11 September 2025 (no violation of Article 8);
- *Baena Salamanca v. Spain*, no. 23236/22, 6 November 2025 (no violation of Article 8).