

# **Activism for Responsible Technology Policymaking: The Case of Homo Digitalis and Clearview AI**

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## **Introduction and Theoretical Background**

The rapid evolution of artificial intelligence (AI) and related digital technologies has outpaced traditional regulatory frameworks, prompting a re-examination of governance mechanisms in the digital age. As a consequence, regulators across geographies have been rushing to revisit their policymaking apparatus in the face of rapid digitalization and have started introducing new regulations in this space (e.g., EU AI Act<sup>1</sup>, Canada AI and Data Act<sup>2</sup>, and UK's regulatory sandboxes<sup>3</sup>, among others). Clearly, coming up with such policy frameworks and enforcing them has become one of the most challenging tasks for regulators. Among key factors that contribute to such policymaking is the role of activism, often powered by digital technologies. Activism has emerged as a powerful force to shape regulatory frameworks, offering a means for the public to assert ethical boundaries on technological innovation.

Information systems (IS) and organizational studies research have increasingly started examining how digital technologies enable social activism (e.g., Faik et al., 2020; George & Leidner, 2019; Mindel et al., 2024). For instance, in their study of the Gulf of Mexico oil spills, Vaast et al. (2017) highlight how the affordances of microblogging platforms allow multiple actors to adopt emerging and interdependent roles, thereby enabling actors to co-produce and circulate content centered on issues of mutual interest through connective actions. Similarly, Faik et al. (2020) theorize sensegiving, translating, and decoupling as key mechanisms through which technology affordances scale and fuel societal change. While these studies have offered rich insights on the role of IS in facilitating social movements and activism, the impact of such activities on policymaking relative to AI and other digital technologies has remained underexplored. It is crucial to examine these dynamics because digital technologies play a dual role here: On the one hand, they enable social activism, while on the other hand, they are often the reason why activists are lobbying regulators to develop regulatory frameworks.

In this paper, we focus on a campaign led by Homo Digitalis ([www.homodigitalis.gr](http://www.homodigitalis.gr))—a small volunteer-based Greek digital rights advocacy group—to denounce the practices of Clearview AI ([www.clearview.ai](http://www.clearview.ai)), a large American facial recognition firm. Homo Digitalis has been focusing on promoting and defending human rights in the modern digital era in Europe by raising awareness, shaping policy decisions, and enacting strategic legal interventions. In this study, our focus is on their activities with reference to the implementation of Clearview AI-provided technologies across Europe of which even some government agencies were the beneficiaries. The case exemplifies the tension between corporate innovation and regulatory oversight, where grassroots mobilization challenges expansive technological practices through legal and public channels.

Using qualitative content analysis techniques, we find that Homo Digitalis spearheaded campaigns emphasizing privacy protection, ethical governance, and accountability in the deployment of facial recognition technology. Their advocacy and that of allied activist groups influenced key regulatory bodies

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<sup>1</sup> <https://www.europarl.europa.eu/topics/en/article/20230601STO93804/eu-ai-act-first-regulation-on-artificial-intelligence>

<sup>2</sup> <https://ised-isde.canada.ca/site/innovation-better-canada/en/artificial-intelligence-and-data-act-aida-companion-document>

<sup>3</sup> <https://www.gov.uk/government/collections/ai-airlock-the-regulatory-sandbox-for-aiamd>

such as the Hellenic Data Protection Authority and supranational entities like the European Data Protection Board. Through strategic use of legal instruments—most notably the General Data Protection Regulation (GDPR), a European Union (EU) law that regulates how personal data is collected and processed—Homo Digitalis has triggered investigations, mobilized public support, and helped establish enforcement precedents. These efforts have contributed to policy shifts that are now reflected in the EU AI Act, where facial recognition practices have been stringently regulated.

These findings illustrate how activist interventions can reshape the practices and expertise of both domain and technical experts involved in digital policymaking. By exploring the interplay between grassroots activism and large-scale policymaking, our research elucidates how transformative pathways for responsible technology regulations can emerge from coordinated civil society efforts. Ultimately, the paper contributes to a deeper understanding of the mechanisms through which activism not only challenges but also redefines the parameters of ethical and legal frameworks in the digital era.

## Methodology

To explore the impact of activism on technology policymaking, we adopt a mixed-methods approach combining qualitative content analysis supported by systematic web scraping, topic modeling, and qualitative interviews. Our automated web scraping—executed using Python frameworks such as Selenium and Playwright—targeted documents from news outlets, governmental portals, regulatory bodies, and advocacy websites. Using keywords like “Clearview AI,” “Homo Digitalis,” “facial recognition,” “privacy,” and “regulations,” we compiled a dataset of documents and metadata (publication dates, sources, document types) from 2020 onward. This structured dataset provided the basis for mapping the chronology activist influence on policy shifts. In parallel, we collected legal and regulatory documents, including GDPR complaints, data protection authority (DPA) rulings, and policy recommendations from Greece, EU, and other country-level sources. This corpus enabled us to contextualize activist actions within the evolving legal landscape, establishing links between grassroots mobilization and formal enforcement outcomes.

Our initial analysis employs grounded techniques to perform inductive thematic analysis (Charmaz & Thornberg, 2021) and adopting a process approach that views phenomena as being in flux and unfolding over time (Langley et al., 2013). We started by developing a chronology of events including activist initiatives, regulatory responses, and corporate actions (to access the online appendix containing this chronology, [click here](#), then select the “Files” option and download in .xlsx or .pdf format for easier viewing). This timeline helped us elucidate cause-and-effect relationships among stakeholders, showing how the initiatives of Homo Digitalis and allied activist groups led to significant regulatory and policymaking developments—from GDPR enforcement actions and financial sanctions against Clearview AI to policy actions culminating in the EU AI Act. We then analyzed these data using grounded theoretic methods (Charmaz 2006). Preliminary findings based on this analysis are reported below.

In the next steps of this project, we intend to complement this analysis using two approaches. First, we plan to conduct 25–30 semi-structured interviews with activists affiliated with Homo Digitalis and allied activist groups. We aim to capture the activists’ first-hand experiences and perspectives on the strategies they deployed, and the regulatory and corporate responses they triggered. These interviews will allow us to focus on the often-overlooked perspective of activist groups to offer an analysis of how events unfolded from their standpoint. Second, we intend to use an interpretive approach to topic modeling (Hannigan et al., 2019; Hickman et al., 2022) to further analyze archival records and interview transcripts. In combining these methods, we intend to develop a theoretical process model and visual representation (Langley & Ravasi, 2019) of how activism impacts policymaking in rapidly evolving technology contexts.

## Preliminary Findings

### ***Sounding Alarm: Catalyzing Public Awareness and Legal Action***

Early media reports, including a high-profile exposé in the New York Times in January 2020 (Hill 2020), revealed Clearview AI’s controversial data practices and catalyzed public concern over facial recognition technologies. Homo Digitalis skillfully harnessed this media attention to mobilize public opinion and initiate legal complaints. Quantitative sentiment analysis of online discussions indicated a surge in public

scrutiny following key activist interventions, suggesting a strong correlation between digital mobilization and heightened regulatory attention.

### ***Mobilizing Regulators and Driving Accountability***

Strategic legal interventions by Homo Digitalis and allied activist groups have triggered a cascade of regulatory actions. For instance, in May 2021, coordinated GDPR complaints were filed not only in Greece but also in France, Austria, Italy, and the United Kingdom. These complaints led to formal investigations by the Greek Data Protection Authority and other national regulatory bodies. Subsequent rulings—such as a €20 million fine imposed by the Greek DPA in July 2022—demonstrate how activist-led legal actions have compelled Clearview AI to modify its practices. Similar sanctions in France, Italy, and the Netherlands further underscored the transnational impact of these interventions.

### ***Shaping Policy***

The interplay between activist actions and regulatory responses is most evident in the evolution of the EU AI Act. The activism of Homo Digitalis and allied groups not only led to enforcement actions but also played a key role in embedding stringent privacy and surveillance safeguards within the new legislative framework. In August 2024, the EU AI Act was finalized, and by February 2025, provisions—such as the ban on public biometric surveillance—came into force. This institutionalization of activist demands into formal policy highlights the transformative potential of activism in technology governance and regulation.

### ***Crosscutting Themes***

We identified three themes that cut across these phases. One theme is about repeated emphasis on the risks associated with unchecked biometric data collection, alluding to privacy and surveillance issues. The second theme is about demands for clearer regulatory oversight and corporate transparency in AI landscape alluding to transparency and accountability issues. The third theme is about persistent tension between technological innovation and ethical safeguards, alluding to the paradox between innovation and control. These themes not only reflect the immediate concerns raised by activist campaigns but also indicate broader debates on the role of technology in society. Figure 1 presented in the next page summarizes our findings in the form of a “temporal bracketing” (Langley et al., 2013, p. 7) analysis of the chronology of interactions among digital rights activists, regulatory bodies, and Clearview AI.

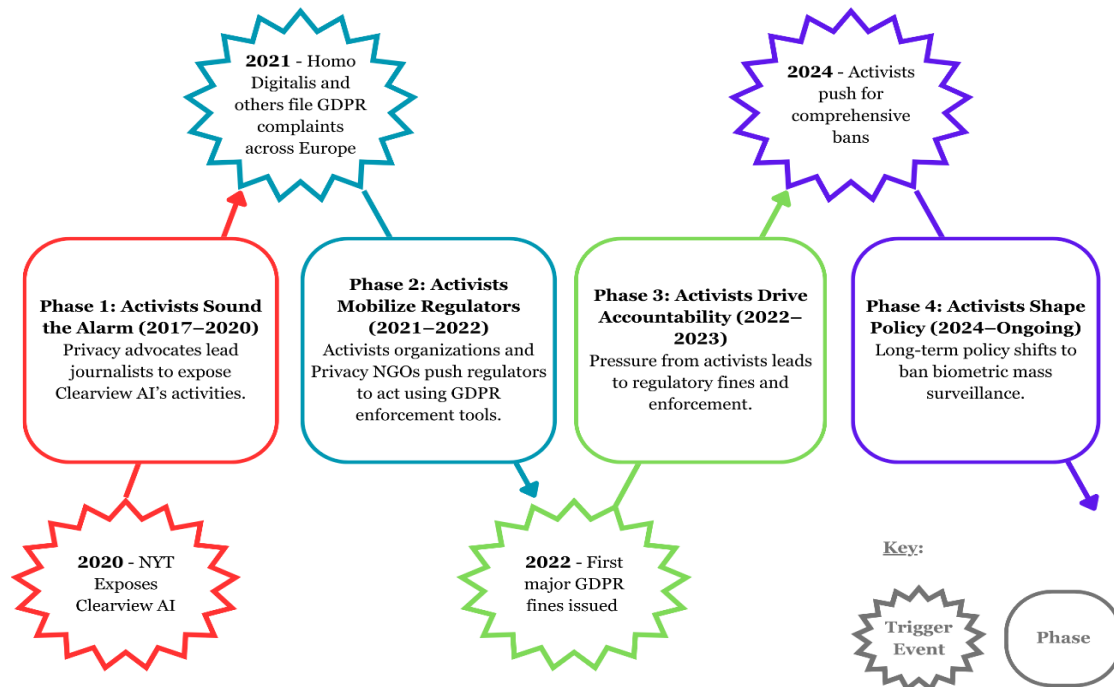
## **Discussion**

The case study of Homo Digitalis versus Clearview AI demonstrates that grassroots activism not only raises public awareness but can also have major impact on policymaking and the development of large-scale regulatory frameworks. While existing literature has examined how digital activism can foster corporate accountability (Ghobadi & Sonenshein, 2024; Vaast et al., 2017), less attention has been paid to how activism can have a major impact on policymaking processes and outcomes. Our study addresses this gap, demonstrating how legal interventions, strategic public engagement, and transnational coordination by grassroots activist groups can drive regulatory actions and policy developments.

Prior studies have emphasized how digital tools enable collective action by activist groups across dispersed geographical locations (Massa & O'Mahony, 2021; Vaast et al., 2017). Our study contributes by showing how a dispersed network of small activist groups can organize into cohesive transnational initiatives to shape policymaking in impactful ways. Homo Digitalis and allied activist groups strategically used legal mechanisms (GDPR complaints) to trigger regulatory scrutiny, a shift from reactive protest (e.g., Ghobadi & Sonenshein, 2024) to institutional engagement. Our study also shows that unlike traditional activism, which often relies on external lobbying, this case illustrates how activists can embed themselves within governance structures to shape regulations from within the policymaking process. Our findings reinforce the argument that social media not only amplifies activism (e.g., Vaast et al., 2017) but also drives regulatory actions and policy developments.

Our study offers practical implications for policymakers, technology firms, and activists. Policymakers should recognize activist groups as key stakeholders, especially in regulating emerging digital technologies. Technology firms may benefit from proactively engaging with activist groups, not only to mitigate legal and

reputational risks, but also to foster responsible and inclusive innovation. Activist groups may draw on this case as a model of how to combine public awareness campaigns, cross-border coordination, and targeted legal interventions to participate in the regulatory process in ways that generate impactful policy developments in the technology domain towards responsible corporate practices.



**Figure 1. Interplay of Digital Activism and Policymaking for AI**

## Concluding Thoughts and Next Steps

In examining Homo Digitalis's campaign against Clearview AI, our study underscores how activism is not merely a disruptive force but also an essential driver of responsible policymaking in technology domain. Our study demonstrates that legal and digital activism, when strategically coordinated, can shape regulatory landscapes, setting precedents for AI governance. Given our study is still work in progress, our next steps include adding further analysis of archival records using topic modeling as well as adding more data using interviews and qualitative insights to further unpack activism's influence on AI policymaking. Interviews with activists will provide deeper insights into strategic decision-making, while topic modeling will trace evolving narratives in media, regulatory reports, and activist discourse. We also intend to theoretically validate these insights by examining other AI regulatory debates.

## REFERENCES

- Charmaz, K. (2006). *Constructing Grounded Theory: A Practical Guide through Qualitative Analysis* (1st edition). SAGE Publications Ltd.
- Charmaz, K., & Thornberg, R. (2021). The pursuit of quality in grounded theory. *Qualitative Research in Psychology*, 18(3), 305–327.
- Faik, I., Barrett, M., & Oborn, E. (2020). How information technology matters in societal change: An affordance-based institutional perspective. *MIS Quarterly*, 44(3), 1359–1390.
- George, J. J., & Leidner, D. E. (2019). From clicktivism to hacktivism: Understanding digital activism. *Information and Organization*, 29(3), 100249.

- Ghobadi, S., & Sonenshein, S. (2024). Creating collaboration: How social movement organizations shape digital activism to promote broader social change. *Journal of the Association for Information Systems*, 25(3), 781-803.
- Hannigan, T. R., Haans, R. F. J., Vakili, K., Tchalian, H., Glaser, V. L., Wang, M. S., Kaplan, S., & Jennings, P. D. (2019). Topic modeling in management research: Rendering new theory from textual data. *Academy of Management Annals*, 13(2), 586–632.
- Hickman, L., Thapa, S., Tay, L., Cao, M., & Srinivasan, P. (2022). Text preprocessing for text mining in organizational research: Review and recommendations. *Organizational Research Methods*, 25(1), 114–146.
- Hill, K. (2020, January 18). The secretive company that might end privacy as we know it. *The New York Times*. <https://www.nytimes.com/2020/01/18/technology/clearview-privacy-facial-recognition.html>
- Langley, A., & Ravasi, D. (2019). Visual artefacts as tools for analysis and theorizing. In T. B. Zilber, J. M. Amis, & J. Mair (Eds.), *Research in the Sociology of Organizations* (Vol. 59, pp. 173–199). Emerald Publishing Limited.
- Langley, A., Smallman, C., Tsoukas, H., & Van De Ven, A. H. (2013). Process studies of change in organization and management: Unveiling temporality, activity, and flow. *Academy of Management Journal*, 56(1), 1–13.
- Massa, F. G., & O'Mahony, S. (2021). Order from chaos: How networked activists self-organize by creating a participation architecture. *Administrative Science Quarterly*, 66(4), 1037–1083.
- Mindel, V., Overstreet, R. E., Sternberg, H., Mathiassen, L., & Phillips, N. (2024). Digital activism to achieve meaningful institutional change: A bricolage of crowdsourcing, social media, and data analytics. *Research Policy*, 53(3), 104951.
- Vaast, E., Safadi, H., Lapointe, L., & Negoita, B. (2017). Social media affordances for connective action: An examination of microblogging use during the Gulf of Mexico oil spill. *MIS Quarterly*, 41(4), 1179-1206.