

EUROPEAN HISTORICAL GAME STUDIES

Volume 1/2026

Issue 1

UKRAINIAN GAMES OF WAR

GDAŃSK UNIVERSITY PRESS

GDAŃSK 2026

Table of Contents

Michał Mochocki, Yaraslau I. Kot	
Editorial: EHGS and Ukrainian Games of War	[5]
Aliaksandr Razhkou	
Features of the Use of Religious Symbols in Ukrainian Games of War	[9]
Jagoda Kościelniak	
The Semiotics of Wartime Kharkiv in Ukrainian Video Games	[29]
Emilia Mazur, Kacper Karwacki	
The Spectacle of the Absurd: Parody in Video Games as a Tool of Political Satire Relating to Russia's Invasion of Ukraine	[50]
Anna Sroka, Igor Kwasigroch	
Chinese-Speaking Steam Communities in the Face of Russian Aggression: The Case of the <i>Ukraine War Stories</i> Game	[84]
Michał Palmąka	
Preserving Wartime Video Games: Criteria and Methods in the Context of the War in Ukraine	[110]
Yaraslau I. Kot	
Ukrainian Games of War: Born in the Flames of Invasion	[128]

Yaroslau I. Kot

[University of Warsaw, Poland; European Humanities University, Lithuania]

Ukrainian Games of War: Born in the Flames of Invasion

[<https://doi.org/10.26881/ehgs.2026.1.06>]

[Abstract]: While the geopolitical and human consequences of the war dominate international discourse, a less-examined but arguably equally significant cultural phenomenon has emerged as never before: the development of video games as a reaction to and means of war. As the war in Ukraine has unfolded, Ukrainian game developers, along with international studios, have been creating video games that reflect, respond to, and preserve the history of the invasion. This article, which focuses on Ukrainian-developed games from 2022 to 2025 that address the ongoing war in Ukraine, represents the first published output of a multi-year research initiative involving the analysis of over two hundred titles. It presents preliminary insights, outlines future research directions, and includes a catalogue of 200+ video games created in response to Russia's full-scale invasion in 2022.

[Keywords]: games of war, game studies, Ukrainian games, Ukrainian war, war in Ukraine, historical games

1. Introduction

The full-scale Russian invasion of Ukraine in February 2022 has transformed not only geopolitical realities but also the cultural and creative landscape of Eastern Europe. While the war's political, military, and humanitarian dimensions have dominated global attention, a parallel process of cultural resistance has been unfolding within the digital sphere (see e.g., Pamment et al.

2023). Among its most dynamic and revealing manifestations is the rapid emergence of video games created in direct response to Russian aggression. These games, developed by Ukrainian creators both within the country and across the diaspora, represent an unprecedented convergence of art, activism, heritage preservation, and digital resilience (Games Gathering 2025).

Historically, video games have served as tools for both entertainment and profit, as part of the global industry. Yet the Ukrainian case presents a unique chapter in the history of interactive media: games are being developed during an ongoing war, amid displacement, destruction, and existential uncertainty. These works not only document and interpret real events but also contribute to the broader struggle for cultural survival and international awareness. They provide players with emotionally charged, interactive representations of conflict, functioning as digital archives of national experience, trauma, and endurance.

This article presents findings from the first stage of the Games of War project, an ongoing research initiative and dataset that catalogues and analyses more than 200 games developed by Ukrainians since 2022 in response to Russia's invasion. The project's central aims are (1) to create a comprehensive catalogue of Ukrainian-developed games addressing the Russian invasion; (2) to map diverse functions these games perform during crisis, ranging from therapeutic and psychological support to political resistance and cultural advocacy. By examining these games as cultural artefacts and instruments of resilience, the project seeks to expand scholarly understanding of how video games as interactive media operate under extreme historical circumstances.

Preliminary findings suggest that these "Games of War" constitute a distinctive subgenre within global war-provoked game production. Unlike conventional war games, which often strive for ambiguous moral symmetry or detached realism, Ukrainian wartime games tend to present a clear ethical stance: the defense of homeland and humanity against aggression and oppression. Their narratives foreground civilian suffering, solidarity, and heroism, while their mechanics invite players to participate in acts of care, survival, rebuilding, or symbolic resistance and justice. In doing so, they challenge dominant paradigms of war representation in digital culture, which tend to frame conflicts as morally ambiguous "gray" zones with all sides equally

right/wrong (McKee and Porter 2009) and open new spaces for collective memory-making (Funkenstein 1989; Klein 2000).

The article situates the Games of War project within broader interdisciplinary debates, introduces the methodology of data collection, categorisation, and outlines key trends within the dataset.

2. Research background and rationale

Video games have long been recognized as a medium capable of engaging with complex historical, social, and ethical issues. Titles such as *This War of Mine* (11 bit studios 2014) and *Valiant Hearts: The Great War* (Ubisoft Montpellier 2014) have explored the human cost of conflict, often placing players as witnesses or participants in morally ambiguous wartime roles *Hell Let Loose* (Creative Assembly / Team17. 2019) and *Hearts of Iron IV* (Paradox Interactive 2016). However, the 2022 Russian invasion of Ukraine has generated a distinctly new wave of game production, one rooted in immediate historical experience, collective trauma, and urgent resistance. Unlike earlier war-themed titles that typically drew upon distant, often fictionalized conflicts, Ukrainian wartime games are being created under conditions of ongoing violence, displacement, and national struggle with distinct ethical polarization. This makes them both primary sources and cultural responses – artifacts of lived history.

The relationship between war, media, and memory has been widely discussed in the humanities (Erl 2017), yet video games have only recently entered this conversation as instruments of cultural documentation (Bontchev 2015). Scholars such as Aarseth (2019), Bogost (2007), and Chapman (2016) have emphasized the potential of games to shape historical consciousness through procedural and interactive representation. Building upon these theoretical insights, this research extends the discussion into the context of real-time war, examining how Ukrainian developers mobilize game design as a vehicle for testimony and emotional resilience. The immediacy of their production blurs the lines between creation, survival, and activism.

Prior to 2022, the Ukrainian gaming scene was already vibrant, though largely integrated into global entertainment markets (EGDF 2023). Russia's invasion radically transformed its functions and motivations. Many developers transitioned from commercial production to creating games with explicitly civic, psychological, or patriotic objectives (Twigames Inc. 2026; Marevo Collective 2025). These games often prioritize impact over profit, becoming tools of communication and resistance: raising funds for the war effort, spreading awareness, or countering propaganda through storytelling and satire.

3. Project “Games of War”’s objectives

The primary aim of this research is to examine how video games created during Russia's ongoing invasion of Ukraine (2022–present) function as tools of cultural expression, memory-making, and political resistance. Previous publications have only referenced several such games, overlooking the broader scope of production and missing the opportunity to draw meaningful conclusions (Zinovieva 2023; Korshunov 2022; Evans-Thirlwell 2022). By systematically researching and cataloguing Ukrainian-developed games and related community projects, this study seeks to build a reliable, comprehensive, and current resource that supports interdisciplinary inquiry across game studies, cultural memory, digital heritage, and media studies.

The rationale for this research is threefold. First, there is an urgent need to document and preserve these games before they disappear – many of them are small-scale, browser-based, or created under precarious conditions, making their survival uncertain (for example, *For the Victory of Ukraine! War* [Dream Team UA 2022]). Second, a systematic analysis of their themes, aesthetics, and functions will provide new insights into how societies use interactive media and games during wartime, their functions magnified by conditions of ongoing crisis. Finally, it aims to investigate the political and communicative dimensions of wartime game development, including its role in propaganda and countering propaganda, the promotion

of Ukrainian language and culture, and global engagement through interactive storytelling.

In addition to its core goals, the *Games of War* project pursues several auxiliary objectives. These include: (1) classifying war-related games by purpose, genre, and social function (for example, differentiating between Games of War UA, Games of Support, Cultural Renaissance Games, and Patriotic Literacy Games, etc.); (2) establishing a typology of wartime game production; to provide an open-access dataset of the catalogued games; and (3) providing an open-access dataset that enables international researchers to conduct comparative, longitudinal, and cross-cultural research on digital media, war, and cultural resilience.

Ultimately, this study aims to contribute to a broader understanding of cultural resilience in the face of war, positioning Ukraine's digital creativity as a vital component of global cultural heritage. Through these objectives, the project seeks not only to advance scholarly insight into wartime interactive media but also to preserve a vital corpus of digital heritage created under conditions of existential threat.

4. Methodology of cataloguing and dataset description

This project employs both qualitative and quantitative methods to systematically document, analyze, and interpret video games developed by Ukrainian creators during the ongoing Russian invasion. The methodology integrates digital ethnography, content analysis, and data cataloguing to capture both the breadth and depth of wartime game production. The research follows the principles of transparency, reproducibility, and ethical sensitivity, particularly when handling culturally and politically significant materials.

4.1. Exclusion and inclusion criteria

Data collection is continuous, allowing for updates as new games emerge. The core dataset includes Ukrainian-developed video games created or released after 24 February 2022 that directly or symbolically address the

Russian invasion and/or its consequences. Game sources are diverse and decentralized. They include: major digital distribution platforms such as Steam (creat. 2003; Valve Corporation 2026), itch.io (creat. 2013; Leaf Corcoran 2026) the App Store (creat. 2008; Apple Inc. 2026), Google Play (creat. 2008; Google LLC 2026), and Game Jolt (creat. 2003; Game Jolt Inc. 2026); official developer websites and social media accounts; Ukrainian media outlets, technology and gaming portals, Ukrainian YouTube game bloggers and influencers; industry events with Ukrainian game showcases such as Games Gathering and GameOn; individual interviews and direct inquiries within game development communities.

To ensure the coherence and relevance of the dataset, the following inclusion and exclusion criteria were applied:

- > only fully autonomous game projects were considered – titles requiring another game as a foundational platform (such as mods, DLCs or expansions) were excluded;
- > games must have been developed or co-developed by Ukrainian individuals, studios, or collectives, with authorship demonstrably tied to the Ukrainian creative community;
- > the catalogue includes only games developed and/or released after 24 February 2022, marking the onset of the full-scale Russian invasion;
- > included titles must be thematically, visually, or symbolically connected to the invasion, whether by representing specific events, depicting wartime experiences, or engaging with symbolic or allegorical forms of wartime expression;
- > only publicly accessible works were included – either completed games or playable prototypes made available via digital distribution platforms or developer websites;
- > non-interactive works – such as visualizations, simulations, or artistic pieces lacking ludic or narrative structure – were excluded, as they fall outside the definitional scope of games for this study.

Collected games are undergoing a manual coding and thematic tagging process, in which each title is classified according to its primary purpose, genre, social function, and developer. This classification contributes to a broader typology established in earlier stages of the research.

4.2. Other categories of games

Although the dataset released with this article includes only the “Games of War UA” category, the full typology encompasses other groups: Mods and DLCs; Games of Support; Ukrainian Cultural Renaissance Games; and Patriotic Literacy and Educational Games.

The category of Mods and DLCs comprises community-created modifications and downloadable content for pre-existing commercial games that incorporate Ukrainian symbols, narratives, or missions related to the invasion. Functioning as rapid-response tools of political and cultural engagement, these works – such as the *Arma 3 – Ukrainian Armed Forces Mod* (Svaróg 2022), *Workers & Resources: Help for Ukraine Pack* (3Division 2024), or Ukraine-themed content in *Minecraft* (PippenFTS 2024), *Roblox* (Lukas 2022) and *Squad* (Squad 2025) – require distinct methodological strategies due to their derivative nature.

The analysis also identified the category of Games of Support. These titles are created by foreign developers to promote humanitarian aid, international solidarity, and fundraising for Ukraine’s defense and recovery. While modest in production scale, they often make significant emotional and social contributions through symbolic storytelling and integrated donation mechanisms. Examples include *Ukraine vs. OrcZ* (Alaric von Teplitz 2022), *Grand Theft Tractor: Ukraine* (PGM Studio 2022), and *Defiance: 2nd Russo-Ukrainian War* (Dockter and Herman 2024).

Another category, Ukrainian Cultural Renaissance Games, consists of titles designed to preserve, reinterpret, or revitalize Ukrainian cultural heritage, folklore, and language as acts of cultural resistance. These games highlight national mythology, traditional crafts, and historically suppressed cultural narratives. Examples include *De Libertate: Ukraine 1917–22* (KioviaGame 2023), *Rukavychka* (Holy Pangolin 2022), *Sich Tactics* (Gard Interactive n.d.), and *Famine Way* (STELLARIUM.gaming n.d.).

Patriotic Literacy and Educational Games merge entertainment with civic education. Teaching Ukrainian history, geography, culture, and national symbols through quizzes, decision-making scenarios, or gamified lessons, such games are often produced by schools, NGOs, or grassroots initiatives.

Representative titles include *History of Ukraine* (MindSprintGames 2023), *Вікторина: Грай Українською* [“Quiz: Play in Ukrainian”] (Anemos llc. 2023).

Together, these categories illustrate the breadth of wartime game production and the diverse functions interactive media serve during ongoing conflict. They offer rich material for future research.

4.3. Ethical considerations

Given the sensitivity of the topic and the conditions under which many of these games were created, this research adheres to strict ethical standards. All materials are cited with full attribution and drawn exclusively from publicly available information, ensuring respect for creators’ intellectual property. Politically sensitive content is treated with caution: descriptions are factual and non-judgmental, and the reproduction of harmful imagery or narratives is avoided.

The study also protects the privacy of vulnerable individuals and communities by refraining from disclosing any non-public personal data about developers or players without their explicit consent. The analysis remains attentive to the broader context of war, displacement, and trauma in which these games emerged, emphasizing respectful and empathetic representation throughout.

All data handling and dissemination practices conform to the European Code of Conduct for Research Integrity (ALLEA 2023) and the General Data Protection Regulation (European Union 2016).

4.4. Data description

The *Games of War UA Dataset* currently documents over 210 titles (Kot 2025), encompassing standalone games, browser-based projects, and community-driven independent works. It serves as a structured foundation for investigating the social, cultural, and psychological functions of wartime interactive media. Each entry in the dataset includes metadata that enables multidimensional analysis of games production, design, and purpose. Core metadata fields include:

- > English title – the title of the game in English; please note that not for all games it is the main title, some projects could be found only in Ukrainian language;
- > alternate title – the title of the game in Ukrainian or alternate English title;
- > developer – individual or collective authorship;
- > availability – availability status: “available” – accessible for players; “unavailable” – not accessible on platform it was published; in development; “withdrawn [date]” – if we know when exactly the game was withdrawn by the creator; “in redevelopment” – game was published and available, then creator withdrew it and changed status to “in development;” “early access” – incomplete version of the game available for players for feedback, but the project is still in development and final release yet to be announced; “available (edited)” – the game had changes to gameplay, narrative and/or title;
- > platform – release platform: PC, mobile, browser, or other;
- > release date – the year (and month, if available) of public release;
- > genre – genre of the game, as defined by its developers or distribution platform;
- > source – link to the website or store where the game is/was available.

The dataset is openly accessible as an Excel file, published alongside the online version of this article in the first issue of the *European Historical Game Studies* journal. It is available through the academic journal platform of the University of Gdańsk (UCN 2026) and permits reuse and redistribution with proper attribution. The *Games of War UA Dataset* is conceived as a living archive, to be continuously updated to reflect the evolving landscape of Ukrainian wartime game production. Version control will be ensured through systematic timestamping, with changelogs recording all additions, modifications, and corrections.

5. Limitations

While this article presents a comprehensive dataset of Ukrainian wartime games, several limitations must be acknowledged.

First, the rapidly evolving nature of wartime game production makes it difficult to capture every title released since 24 February 2022. Some projects are shared on obscure platforms, circulate privately, or remain unreleased, thus eluding systematic documentation.

Second, archiving and digital preservation pose significant challenges. Many of these games are ephemeral, disappearing due to political, logistical, or technical factors. Browser-based and community-created works are particularly vulnerable to such loss (Palmąka 2026).

Third, despite efforts at careful verification, limited transparency within some online communities and collaborative development environments can obscure the provenance of certain titles – especially on platforms such as itch.io (Leaf Corcoran 2026).

Fourth, the ongoing conflict continually reshapes the production, content, and accessibility of games. Consequently, interpretations of their narratives, functions, and social roles remain fluid, shifting in response to military and political developments.

Finally, analysing games created under conditions of war and displacement requires a heightened degree of ethical sensitivity. Accurately contextualizing these works – while avoiding the imposition of external bias – remains an ongoing methodological challenge.

6. Future development

Planned expansions for 2025–2027 include the addition of several new catalogue fields: mechanics, visual style, narrative or thematic focus, and the declared or inferred purpose of each title (e.g., education, resistance, therapy, fundraising). The dataset will also be updated to incorporate newly released Ukrainian games and relevant mods addressing the continuing conflict. Enhanced thematic coding will be applied to account for emerging

subgenres and evolving social functions. Further developments may include cross-referencing the dataset with related digital heritage initiatives in Belarus, Lithuania, Poland, and other countries. Where ethically and legally permissible, the dataset will also integrate player engagement indicators and reception metrics to deepen the understanding of audience interaction and cultural impact.

References

- Aarseth, Espen. 2019. "Ludoforming: Changing Actual, Historical or Fictional Topographies into Ludic Topologies." In *Ludotopia: Spaces, Places and Territories in Computer Games*, edited by Stephan Günzel and Espen Aarseth, 127–140. Bielefeld: Transcript Verlag.
- ALLEA. 2023. "The European Code of Conduct for Research Integrity. Revised Edition." Berlin: ALLEA. Accessed November 26, 2025. https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/european-code-of-conduct-for-research-integrity_horizon_en.pdf.
- Apple Inc. 2026. *App Store*. Accessed March 5, 2026. <https://www.apple.com/app-store/>.
- Bogost, Ian. 2007. *Persuasive Games: The Expressive Power of Videogames*. Cambridge: The MIT Press. Accessed November 26, 2025. <https://tiny.pl/qvs02h70p>.
- Bontchev, Boyan. 2015. "Serious Games for and as Cultural Heritage." *Digital Presentation and Preservation of Cultural and Scientific Heritage*, vol. 5: 43–58.
- Chapman, Adam. 2016. *Digital Games as History: How Videogames Represent the Past and Offer Access to Historical Practice*. New York: Routledge.
- Erl, Astrid. 2017. "Media and the Dynamics of Memory." In *Handbook of Culture and Memory*, edited by Brady Wagoner, 305–324. New York: Oxford University Press.
- EGDF. 2023. "Rebuilding Ukraine (2023)." Accessed November 26, 2025. <https://www.egdf.eu/documentation/3-enablingdigital-growth-with-public-funding/rebuilding-ukraine-2023/>.
- Evans-Thirlwell, Edwin. 2022. "Meet the Ukrainians Making Video Games about Russia's Invasion." *The Guardian*, October 7, 2022. Accessed November 26, 2025. <https://www.theguardian.com/games/2022/oct/07/meet-the-ukrainians-making-video-games-about-russias-invasion>.
- Funkenstein, Amos. 1989. "Collective Memory and Historical Consciousness." *History and Memory*, vol. 1, no. 1: 5–26.
- Game Jolt Inc. 2026. *Game Jolt*. Accessed March 5, 2026. <https://gamejolt.com/>.

- Games Gathering. 2025. *Games of War* [presentation by Yaraslau Kot, Playcus.] YouTube, February 18, 2025. Accessed November 26, 2025. <https://www.youtube.com/watch?v=fURRpVftTFE>.
- Google LLC. 2026. *Google Play*. Accessed March 5, 2026. <https://play.google.com/store/games?hl=en>.
- Klein, Kerwin L. 2000. "On the Emergence of Memory in Historical Discourse." *Representations*, vol. 69: 127–150. <https://doi.org/10.2307/2902903>.
- Korshunov, Serhii. 2022. "Ukrainian Games about the War Against Russia." Accessed November 26, 2025. https://gamedev.dou.ua/articles/ukrainian-games-about-the-war-against-russia/?from=tg&utm_source=telegram&utm_medium=social.
- Kot, Yaraslau. 2025. *Games of War UA Dataset: Catalogue of Ukrainian Video Games Related to the 2022 Russian Invasion*. The dataset is downloadable as a separate XLS file (attachment) in the online version of *European Historical Game Studies*, vol. 1, iss. 1, available through the journal website: <https://czasopisma.bg.ug.edu.pl/index.php/EHGS/>.
- Leaf Corcoran. 2026. *itch.io*. Accessed March 5, 2026. <https://itch.io/>.
- Lukas. 2022. "Ukraine Russia War on Roblox" [We Saved Ukraine]. YouTube, November 12, 2022. Accessed March 5, 2026. <https://www.youtube.com/watch?v=zb-WkRUTTZuw>.
- McKee, Heidi A., and James E. Porter. 2009. "Playing a Good Game: Ethical Issues in Researching MMOGs and Virtual Worlds." *International Journal of Internet Research Ethics*, vol. 2, no. 1: 5–37.
- Palmała, Michał. 2026. "Preserving Wartime Video Games: Criteria and Methods in the Context of the War in Ukraine." *European Historical Game Studies*, vol. 1, iss. 1: 112–129.
- Pamment, James, Jesper Falkheimer, and Elsa Isaksson. 2023. *Malign Foreign Interference and Information Influence on Video-Game Platforms: Understanding the Adversarial Playbook*. Karlstadt: Psychological Defense Agency. Accessed November 26, 2025. <https://tiny.pl/hv825xvtw>.
- PippenFTS. 2024. "We Rebuilt Destroyed Ukrainian Cities in Minecraft." YouTube, September 27, 2024. Accessed March 5, 2026. <https://www.youtube.com/watch?v=IZYJHTA0MjQ>.
- Squad. 2025. "Update 10.0 Official Trailer – Squad: Trident Strike." YouTube, November 11, 2025. Accessed March 5, 2026. <https://www.youtube.com/watch?v=ve3tq5TRxTQ>.
- UCN. 2026. "European Historical Game Studies." Accessed March 5, 2026. <https://czasopisma.bg.ug.edu.pl/index.php/EHGS>.
- Valve Corporation. 2026. *Steam*. Accessed March 5, 2026. <https://store.steampowered.com/>.

Zinovieva, Tetiana. 2023. "War in Ukraine through the Lens of Interactive Media: A Typological Study of Video Games." *Rocznik Instytutu Europy Środkowo-Wschodniej*, vol. 21, no. 2: 213–229. <https://doi.org/10.36874/RIESW.2023.2.11>.

Ludography

11 bit studios. 2014. *This War of Mine*. 11 bit studios. PC, Xbox Series X/S, PlayStation 5, Android, iOS.

3Division. 2024. *Workers & Resources: Soviet Republic – Help for Ukraine*. 3Division. PC. Steam.

Alaric von Teplitz. 2022. *Ukraine vs. OrcZ*. Browser game. itch.io.

Anemos llc. 2023. *Гра вікторина Українською* ["Quiz Game in Ukrainian."] Android. Google Play.

Creative Assembly / Team17. 2019. *Hell Let Loose*. Expressions Games. PC. Steam.
Dockter, D.B., and Mark Herman. 2024. *Defiance: 2nd Russo-Ukrainian War 2022–?* GMT Games. Board game.

Dream Team UA. 2022. *For the Victory of Ukraine! War*. Android. Google Play.

Gard Interactive. [n.d.] *Sich Tactics*. Gard Interactive. PC. Steam.

Holy Pangolin. 2022. *Rukavychka* ["Glove."] Holy Pangolin. Browser game. itch.io.

KioviaGame. 2023. *De Libertate: Ukraine 1917–22*. KioviaGame. Android. Google Play.

Marevo Collective. 2025. *Zero Losses*. Marevo Collective. PC. Steam.

MindSprintGames. 2023. *History of Ukraine*. MindSprintGames. Android. Google Play.

Paradox Development Studio. 2016. *Hearts of Iron IV*. Paradox Interactive. PC. Steam.

PGM Studio. 2022. *Grand Theft Tractor: Ukraine*. PGM Studio. Browser game, PC. itch.io.

STELLARIUM.gaming. [n.d.] *Famine Way*. STELLARIUM.gaming. PC. Steam.

Svaróg. 2022. *Arma 3 – Ukrainian Armed Forces 2035*. Mod for *Arma 3*. PC. Steam Workshop.

Twigames Inc. 2026. *Hollow Home*. PC. Galaktus, Twingames Inc.

Ubisoft Montpellier. 2014. *Valiant Hearts: The Great War*™. PC. Ubisoft.

Legal acts

European Union. 2016. 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). Official Journal of the European Union L 119 of 4.05.2016. Accessed November 26, 2025. <https://eur-lex.europa.eu/eli/reg/2016/679/oj>.