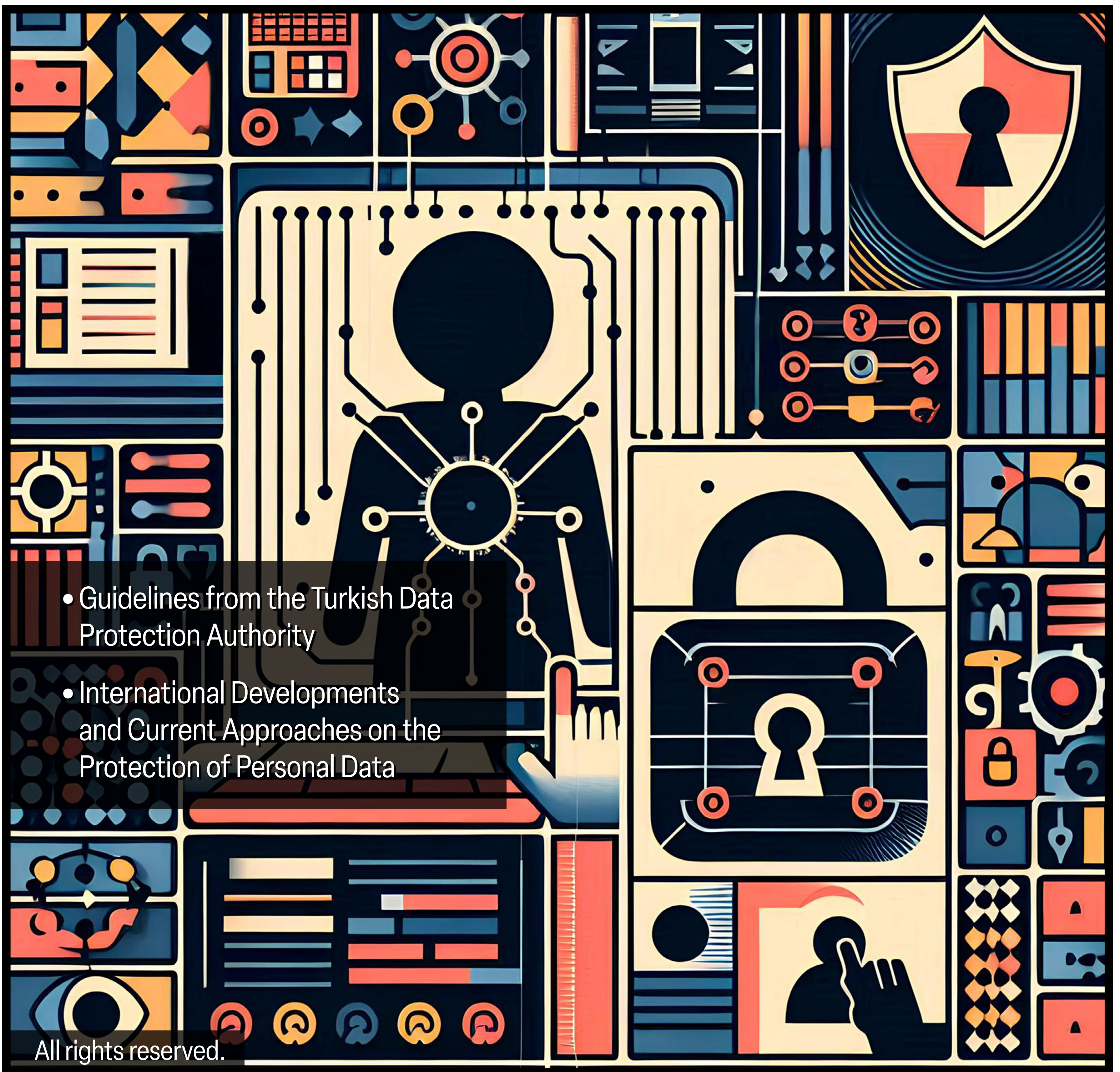


THE FINE PRINT

Answers. Not theories.



Guidelines from the Turkish Data Protection Authority

The Turkish Personal Data Protection Authority (**TDP Authority**), which is the competent authority on personal data protection legislation in Türkiye, regularly publishes various guidelines and documents regarding the Turkish Data Protection Law (**TDPL**) and secondary legislation. These publications include not only general guidance but also detailed sector-specific or topic-specific documents aiming to inform both data controllers and data subjects. These guidelines are also particularly valuable as they reflect the Authority's interpretation on specific matters.

In the last two months, the TDP Authority has published several new guidelines and updated many of its previously published ones. A closer look at the updated documents shows that the main reasons behind these updates are technological developments and the need to clarify certain concepts or practical issues. In addition, the fundamental changes introduced in June 2024 to the legislation on the international transfer of personal data—and their continuing impact throughout 2024—have been one of the primary drivers for these updates.

TDP Authority regularly publishes newly issued or revised guidelines on its official website. Among the documents published in the past month, the following are particularly critical:

- Guide on Personal Data Security – Technical and Administrative Measures

<https://www.kvkk.gov.tr/SharedFolderServer/CMSFiles/7512d0d4-f345-41cb-bc5b-8d5cf125e3a1.pdf>

- Guide on Fulfilling the Obligation to Inform

<https://www.kvkk.gov.tr/SharedFolderServer/CMSFiles/a569a068-c079-4189-b134-f57bc727af7d.pdf>

- Implementation Guide on the Law on the Protection of Personal Data – New (March 2025 Edition)

<https://www.kvkk.gov.tr/SharedFolderServer/CMSFiles/41784a70-2bac-4e4a-830f-35c628468646.PDF>

- Assessment of the Right to be Forgotten in the Context of Search Engines

<https://kvkk.gov.tr/SharedFolderServer/CMSFiles/11b6fd99-d42a-45b1-a009-21f2d36ded21.pdf>

- Guide on Key Considerations in the Processing of Genetic Data

<https://kvkk.gov.tr/SharedFolderServer/CMSFiles/703442e0-690c-4618-91c3-83e7583170ca.pdf>

- Guide on the Processing of Turkish Republic Identity Numbers

<https://www.kvkk.gov.tr/SharedFolderServer/CMSFiles/a828de56-b2b2-43bf-b77d-cc05de5b2c84.pdf>

These guidelines often include references to specific regulatory provisions where applicable and serve as a practical resource for professionals working in the respective subject areas. Moreover, TDP Authority frequently references EU legislation in many of its publications, contributing to a harmonized interpretation of comparable legal frameworks. Therefore, it is highly advisable for all stakeholders involved in the subject matter to closely follow these guidelines.

International Developments and Current Approaches on the Protection of Personal Data

Issues 42 and 43 of the “Selected Recent Developments on the Protection of Personal Data” have been published on the official website of the Turkish Personal Data Protection Authority.

Below is a summary of the key topics highlighted in these updates:

AI Related Developments

- Q&A Document on AI Literacy by the EU Commission

The European Commission published a Q&A (FAQ) document regarding AI literacy, pursuant to Article 4 of the EU AI Act.

The document emphasizes the importance of ensuring that individuals affected by AI systems, as well as employees, have sufficient knowledge and awareness about AI. It also highlights the responsibility of developers in this regard.

- AI Data Security Guide Led by NSA

The U.S. National Security Agency (NSA), in collaboration with cybersecurity authorities from Australia, New Zealand, and the United Kingdom, published a guide titled “AI Data Security: Best Practices for Securing Data Used to Train & Operate AI Systems.”

The guide addresses data security risks in the development, testing, and operation of AI systems.

Key recommendations include using trustworthy data sources, ensuring data integrity, applying digital signatures, implementing access controls, and conducting continuous risk assessments.

▪ European Commission Launches AI Action Plan

The European Commission announced the launch of the “AI Continent Action Plan.”

The plan includes initiatives such as building large-scale AI data infrastructure, increasing access to high-quality data, developing algorithms for strategic sectors, enhancing AI skills, and simplifying regulations.

EDPS Joins 2025 Coordinated Enforcement Framework

The European Data Protection Board (EDPB) announced in March the initiation of its 2025 Coordinated Enforcement Framework (CEF) action, focusing on the “right to erasure” (GDPR Article 17).

In April, the European Data Protection Supervisor (EDPS) declared its participation in this initiative.

Under the action plan, 30 data protection authorities will assess how data controllers respond to individuals’ erasure requests and how exceptions are applied. Based on the collected data, good and poor practices will be identified, and areas for improvement will be determined.

EDPB Opens Public Consultation on Blockchain Guidelines

The EDPB opened a draft guideline for public consultation concerning the processing of personal data through blockchain technologies.

The guideline covers how blockchain works, the legal implications of data processing using this technology, and how individuals can exercise their rights. It also includes various recommendations for actors involved in data processing.

Efforts to Protect the Best Interests of Children under Data Protection

▪ ICO’s Review on Children’s Data

The UK Information Commissioner’s Office (ICO) published a detailed review on the processing of data belonging to individuals under 18 within the financial sector.

The review assessed the practices of over 40 financial institutions. Although 49% claimed to provide age-appropriate information to children, only a minority tested the understandability of such content. The findings revealed that the language used was often targeted toward adults, and that most organizations considered the responsibility of understanding this information to lie with parents.

Following the study, the ICO recommended the use of clear and simple language, creating age-appropriate content, and enrichment of information through visuals and multimedia tools.

▪ Draft Guide for Protecting Children under the DSA

The European Commission presented a draft guide under the Digital Services Act (DSA) aimed at protecting children in online environments.

The guide outlines measures such as a ban on profile-based advertising to children, embedding privacy into design, providing age-appropriate content, and adhering to the principle of proportionality.

The Commission will collect public feedback on this draft until 10 June 2025.

▪ EPRS Report on Children’s Online Protection

The European Parliamentary Research Service (EPRS) published a research report on protecting children in online environments. The report focuses on the risks to children’s safety and development on the internet and suggests measures to counter these risks.

Recommendations include raising awareness among parents and educators, implementing age-appropriate access controls, and developing mechanisms on online platforms to ensure children’s safety.

▪ JRC Study on Children’s Health and Social Media

The European Commission’s Joint Research Centre (JRC) published a study on the effects of social media use on the mental and physical health of young children.

The study addresses the obligations of online platforms under the EU Digital Services Act to protect children. It discusses the impact of screen time and social media use on children’s health, based on expert opinions and scientific findings.

You can access the related announcements [here](#) and [here](#) (Only available in English).

Editors



Görkem Gökçe

gorkem.gokce@gokce.av.tr



Tuğçe Beyazkılınç

tugce.beyazkilinc@gokce.av.tr



Yağmur Yollu

yagmur.yollu@gokce.av.tr

About us

Gokce Attorney Partnership is an Istanbul-based law firm offering legal services across a broad range of practice areas including mergers and acquisitions, joint ventures, private equity and venture capital transactions, banking and finance, capital markets, insurance, technology, media, telecoms and internet, e-commerce, data protection, intellectual property, regulatory, debt recovery, real property, and commercial litigation. Please visit our web site at www.gokce.av.tr for further information on our legal staff and expertise.

Please contact us at
info@gokce.av.tr
0 212 352 88 33

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