

THE FINE PRINT

Answers. Not theories.



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Presidential Circular on the Action Plan for Empowering Children in the Digital World (2026–2030)

The “Action Plan for Strengthening Children in the Digital World (2026–2030)” entered into force through a Presidential Circular. The Circular was published in the Official Gazette and announced to the public.

The Circular emphasizes the importance of raising children in accordance with the requirements of the rapidly digitalizing world, supporting their healthy development, and strengthening their digital skills. It also prioritizes ensuring children’s safety in online environments within state policies.

The action plan was prepared under the coordination of the Ministry of Family and Social Services. During the implementation process, inter-institutional coordination will be carried out by the Ministry’s General Directorate of Child Services. In addition, a digital monitoring system will be established within the Ministry to track and evaluate the activities to be carried out. Through this system, responsible institutions and organizations will regularly upload information on the activities they have implemented.

The main objective of the action plan, which covers the period 2026–2030, is to reduce the risks that children may encounter in the digital world, develop their digital skills, ensure a safe experience in online environments, and strengthen digital citizenship awareness.

Developments regarding the implementation of the plan will be evaluated through an annual monitoring report, which will be submitted to the Presidency and shared with the public.

The Circular also calls on all public institutions and organizations to diligently fulfill the duties and responsibilities assigned to them within the scope of the action plan.

You can access the full text of the Circular [here](#)

Public Announcement from the KVK Authority on the Protection of Children’s Personal Data in Social Media Use

Personal Data Protection Authority (KVK Authority) has issued a public announcement regarding the protection of children’s personal data in their use of social media. The KVK Authority stated that it has initiated an investigation into several major social media platforms

in order to assess the risks related to the processing and protection of children’s personal data in digital environments.

According to the statement made by the KVK Authority, the data processing practices of social media platforms will be examined with the aim of reducing the risks that children may encounter in digital environments and safeguarding the “best interests of the child” principle. In this context, ex-official investigations have been launched into the following platforms: TikTok, Instagram, Facebook, YouTube, X, and Discord.

Within the scope of the investigation, the KVK Authority will evaluate how these platforms process children’s personal data, what security measures they implement, and whether they comply with their obligations under data protection legislation.

The KVK Authority emphasized that digital platforms must pay particular attention to elements such as lawfulness of processing, explicit consent, data security, and age verification mechanisms when handling children’s personal data. The investigations will include a detailed analysis of the technical and administrative measures implemented by the platforms.

KVK Authority also highlighted potential risks children may face on social media, including data breaches, identity theft, and misuse of personal information. In this regard, the KVK Authority called on both platform providers and families to act more carefully and responsibly.

In its announcement, the KVK Authority underlined that the primary objective of the ongoing investigation process is to ensure that children can exist in digital environments in a safe, informed, and rights-protected manner. It also stated that developments regarding the matter will be closely monitored and that the necessary administrative and legal procedures will continue to be carried out.

Court of Cassation Decision on Audio Recording Taken in Relation to a Mobbing Allegation

The 12th Criminal Chamber of the Court of Cassation made important assessments in a dispute concerning the recording of non-public conversations between individuals. The Chamber held that secretly recording a conversation to which the recorder is a party may not constitute a criminal offense under Article 133 of the Turkish Penal Code in every circumstance.

In the case at hand, it was alleged that the defendant, who worked in a state hospital, secretly recorded a meeting that took place in the office of the complainant, who served as the deputy chief physician at the same institution. The defendant claimed that the recording was made in order to document administrative disputes and allegations of mobbing between the parties. Accordingly, criminal proceedings

were initiated against the defendant for the offense of listening to or recording non-public conversations between individuals using a device.

In its evaluation, the first-instance court determined that the recorded conversation involved only the defendant and the complainant, and that the defendant had recorded a conversation to which he was a party. On this basis, the court concluded that the legal elements of the offense regulated under Article 133 of the Turkish Penal Code were not met and therefore ruled for the defendant's acquittal.

Upon reviewing the case file, the 12th Criminal Chamber of the Court of Cassation upheld the decision of the first-instance court. The Chamber noted that the conversations between the defendant and the complainant concerned ordinary daily matters and did not constitute a violation of the complainant's right to privacy.

Accordingly, the Chamber concluded that the legal elements of the alleged offense were not established, since the defendant had recorded a conversation to which he was a party, and therefore upheld the acquittal decision.

Decision of the Court of Cassation on Monitoring Employees in the Electronic Environment

The 22nd Civil Chamber of the Court of Cassation examined a dispute concerning the termination of an employment contract and the legal nature of data obtained through monitoring an employee in the electronic environment. The Chamber held that data obtained through the electronic monitoring of an employee cannot be relied upon as a ground for termination if the employee was not informed about such monitoring.

In the case at hand, the claimant employee argued that the employment contract had been terminated by the employer without a justified reason and requested the annulment of the objection raised against the enforcement proceeding initiated for the recovery of notice compensation. The defendant employer, on the other hand, asserted that the employment contract had been terminated with just cause pursuant to Article 25/II of the Labour Law No. 4857, based on findings obtained from the examination of the employee's work computer and data allegedly contained in a USB drive belonging to the employee.

During the proceedings, based on expert reports and the evidence contained in the case file, it was determined that the data relied upon as grounds for termination had been obtained through a monitoring program installed on the employee's work computer. However, according to the case file, no concrete evidence was presented to demonstrate that the employee had been informed of or notified about such monitoring activity.

The Court of Cassation emphasized that, although employers may monitor employees in the electronic environment within the scope of their managerial authority, such monitoring can only be considered lawful if the employee has been informed in advance. If the employee has not been informed of the monitoring activity, the data obtained through such monitoring must be regarded as unlawfully obtained and cannot be relied upon as a ground for termination.

Accordingly, the Chamber overturned the decision of the first-instance court, concluding that the termination of the employment contract could not be considered a justified termination under the circumstances.

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