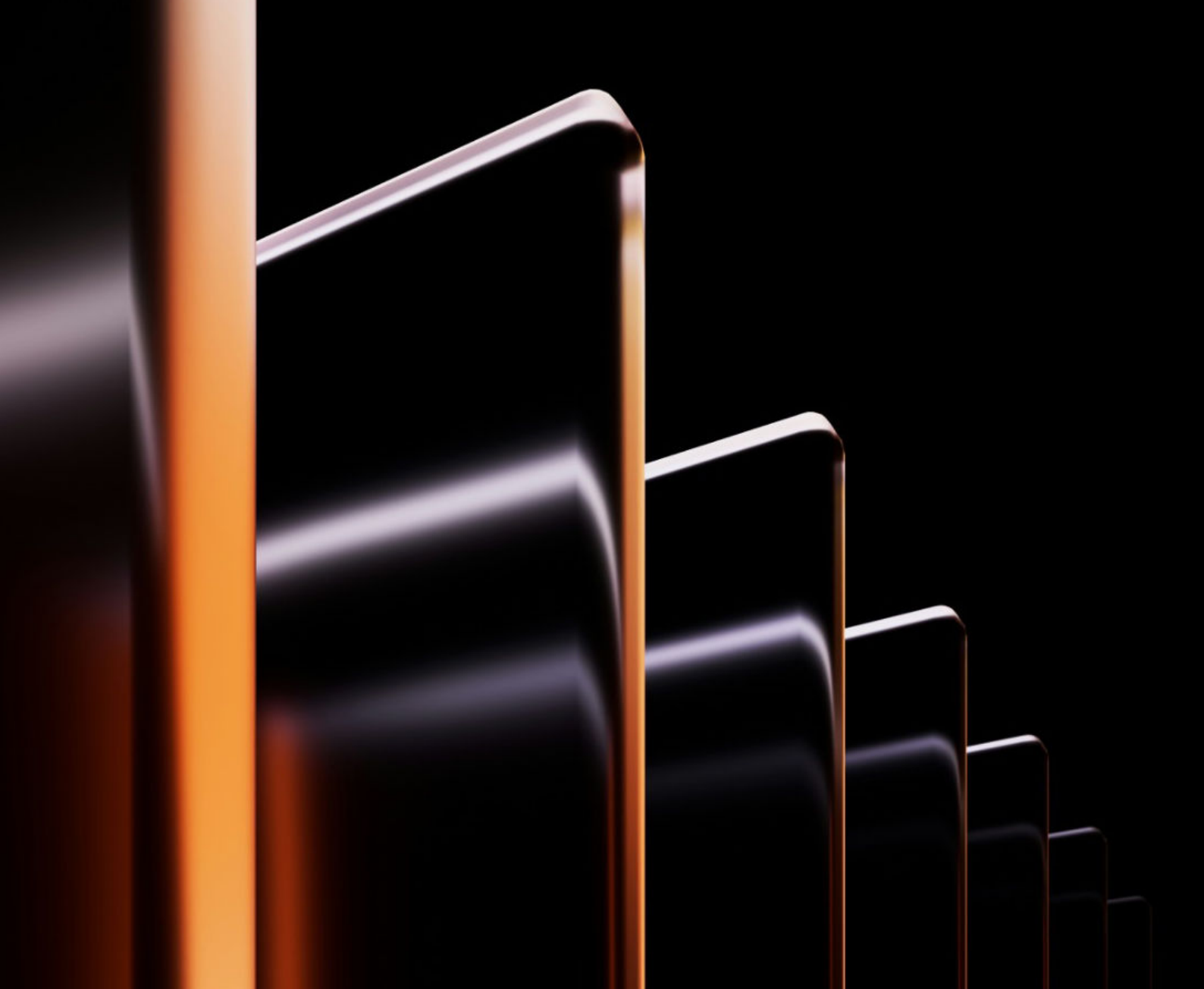


GENTEMIZER

Türkiye's Artificial Intelligence Action Plan for 2026 Published

2026 August



Presidential Circular No. 2026/9, dated 17 August 2026, was published in the Official Gazette on 18 August 2026. The Circular requires public institutions and organisations to carry out the necessary work and provide the support needed to implement the Türkiye Artificial Intelligence Action Plan (the “Plan”), which sets out Türkiye’s artificial intelligence roadmap for the 2026–2030 period.

The Plan organises Türkiye’s artificial intelligence policy into 16 actions across four pillars: “Awareness”, “Adoption”, “Development” and “Governance”. Unlike its predecessor, the Plan sets out measurable policy targets, identifies the responsible public authorities and introduces annual implementation plans and publicly accessible monitoring mechanisms.

16 Priority Actions Under the Action Plan

The Plan’s 16 priority actions focus on improving AI literacy and human capital, strengthening data and computing infrastructure, expanding the use of AI in the public and private sectors, increasing domestic technology production and financing opportunities, and establishing governance mechanisms focused on legal, ethical and security considerations. These actions are organised under the Plan’s four main pillars: Awareness, Adoption, Development and Governance.

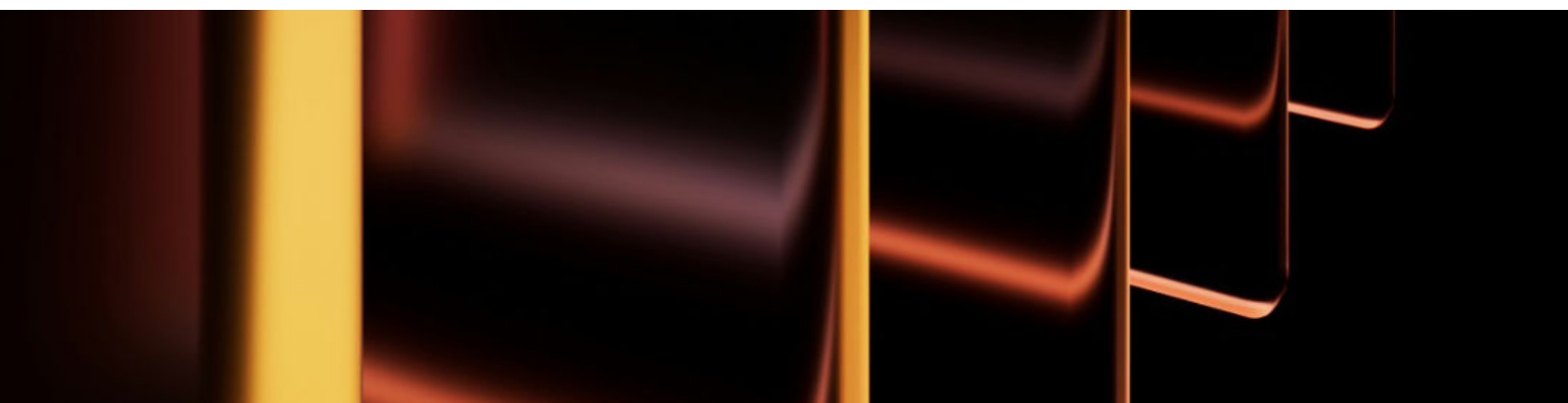
1. Awareness

The “Awareness” pillar aims to strengthen society’s capacity to use AI safely, develop qualified human capital, enhance the data ecosystem and establish a legal and ethical framework for AI systems. To this end, the Plan envisages launching a National AI Literacy and Safe Use Programme, expanding AI education at universities and training AI specialists and practitioners.

The Plan also provides for the establishment of a National Data Library and secure data spaces, the release of public datasets in machine-readable formats and the application of differentiated rules to AI systems based on their risk levels. Algorithmic Impact Assessments and Model Cards for high-impact public-sector AI systems are also envisaged under this pillar.

2. Adoption

The “Adoption” pillar focuses on strengthening the computing infrastructure required for AI and ensuring the sustained deployment of AI solutions in public services and businesses. In this context, the Plan envisages increasing data centre, storage and network capacity, establishing a low-carbon national computing backbone and launching the “GPU for Everyone” Programme, which will provide computing resources to start-ups, SMEs, researchers and public-sector projects.



The Plan aims for the public sector to act as a lead user in the development of AI solutions, launch pilot projects within public institutions and scale up successful solutions through public procurement. It also provides for financial, data, computing, testing and compliance support for projects through sector-specific AI programmes and SME vouchers.

3. Development

The “Development” pillar aims to transform AI infrastructure and pilot projects into domestic products, scalable start-ups and export opportunities. To this end, the Plan envisages establishing AI Growth Zones and Regional Centres of Excellence and providing researchers and businesses with access to shared computing resources, secure data and prototyping facilities.

The Plan also provides for the establishment of a National AI Research Fund and an AI Growth Fund to support fundamental research and start-ups that have achieved product-market fit. It further aims to develop sector-specific AI models in areas such as healthcare, pharmaceuticals, genomics, disaster management, energy, agriculture and the creative industries; increase domestic production capacity in physical AI, robotics and autonomous systems; and support the commercialisation of these solutions in international markets, accompanied by appropriate security testing and Model Cards.

4. Governance

The “Governance” pillar covers measures to support AI investment, develop international and regional cooperation and strengthen security and oversight infrastructure. The Plan

envisages establishing a one-stop system through which investors may manage processes relating to energy, permits, incentives, data transfers and intellectual property, as well as attracting international AI, cloud computing and data centre investments to Türkiye.

This pillar also provides for Türkiye’s active participation in international standard-setting activities, the development of bilateral and regional cooperation on data and computing, and the creation of a shared large language model for Turkic languages. In addition, the Plan aims to test high-impact AI systems for security, performance, bias, explainability and data protection; establish regulatory sandboxes in priority sectors; and prepare a general legislative framework and secondary legislation governing AI.

Key Considerations Regarding Personal Data Protection

The Plan envisages introducing tiered obligations for AI systems according to their level of risk. In particular, it provides for short-form Algorithmic Impact Assessments for medium-risk systems and extended assessments for high-impact systems, together with Model Cards and detailed technical documentation for high-impact systems.

Datasets published through the National Data Library are expected either not to contain personal data or to have been anonymised, while access to sensitive datasets would be provided on a controlled basis through secure data spaces. The Plan also envisages assessing high-impact systems from data protection and security perspectives and using anonymisation,

synthetic data and privacy-enhancing technologies in relation to sensitive datasets.

Conclusion

The strategic direction of the Plan and the allocation of resources will be overseen by the National Artificial Intelligence Board, chaired by the President of Türkiye. A Programme Office to be established within the Ministry of Industry and Technology is expected to monitor implementation, while the National Artificial Intelligence Ethics Board will develop relevant principles and guidelines. The first public progress report is expected to be published

within 12 months, followed by annual reports.

At this stage, rather than imposing general and directly applicable compliance obligations on companies, the Plan envisages various support mechanisms and opportunities, including public procurement, access to GPUs and data resources, SME vouchers, dedicated funds, AI Growth Zones, regulatory sandboxes and export support. Access to these support and scale-up mechanisms is expected to depend, among other factors, on the documentation of data sources and licensing arrangements, security assessments, Model Cards, Algorithmic Impact Assessments and measurable results from pilot projects.

GenTemizer is a Turkish law firm based in Istanbul, Türkiye. We advise various businesses in relation to their investments, M&A, competition law/antitrust, project financing and construction projects as well as on operational and dispute resolution matters in the context of the Turkish regulatory framework. We have also advised investors in relation to government sponsored privatisation projects.

We are listed in *Legal 500*, *IFLR1000* and *Chambers and Partners* as one of the leading law firms in Türkiye. Each of our partners have also been recognised as one of the leading lawyers in Türkiye. We understand and can meet the demanding requirements and innovative, responsive thinking required for an investment transaction in Türkiye.

For more information, you can contact us.



Ebru Temizer
Partner
etemizer@gentemizer.com



Seray Apak Başaran
Senior Associate
sapak@gentemizer.com