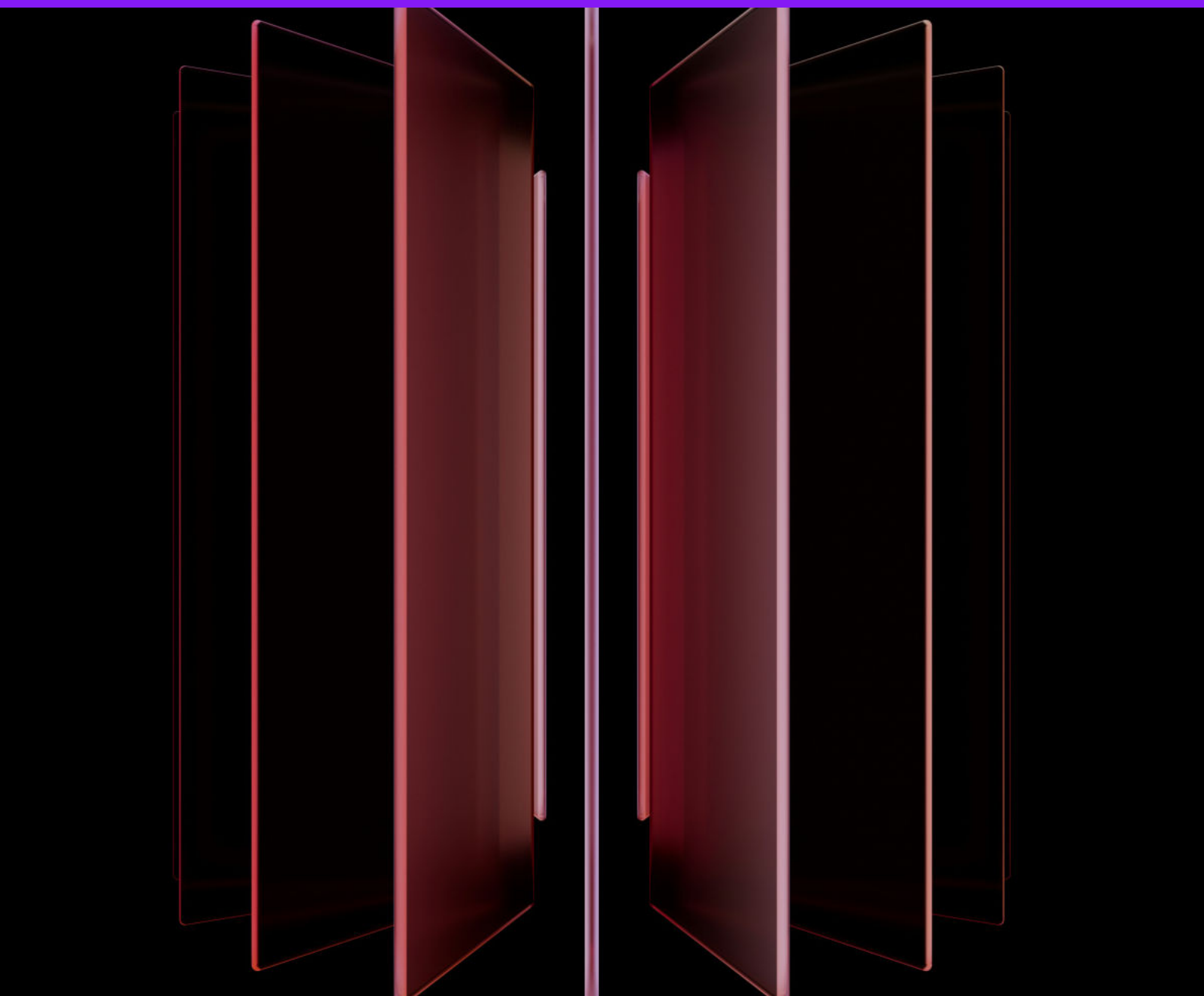
GENTEMİZER

Two-Minute Recap

Data Protection Law Matters **in Türkiye**

2026 October



Turkish Data Protection Authority Issues Principle Decision on the Review of Employees' Corporate Communications

On 16 September 2026, the Turkish Personal Data Protection Board ("Board") adopted Principle Decision No. 2026/2035, published in the Official Gazette on 8 October 2026, establishing the principles and requirements applicable to employers monitoring corporate email accounts and other workplace communication channels, including instant messaging applications, internal communication platforms and meeting tools.

The Board emphasised that employers' monitoring activities must comply with the Turkish Personal Data Protection Law ("PDPL"), particularly the principles of lawfulness, transparency, necessity and proportionality. Employers must provide employees with clear and specific privacy notices explaining the purposes, scope, methods and legal grounds of monitoring, including the circumstances under which communication content may be accessed. The Board also clarified that ownership of corporate communication tools does not grant employers unrestricted access to employees' communications.

The Decision further highlights that monitoring should follow a gradual and proportionate approach, prioritising less intrusive methods. Access to communication content should generally be limited to situations involving concrete suspicions or specific legitimate purposes. Employers must also implement appropriate access controls, security measures and retention periods, while taking into account employees' reasonable expectations of privacy. Failure to comply with these requirements may result in administrative sanctions under the PDPL.

Employers should use the least intrusive method that can achieve the stated purpose. As a rule, they should inspect message contents only where there is a specific suspicion or a legitimate purpose tied to a particular incident, and limit the review to that purpose. Access to the data obtained through monitoring should be limited to authorised staff and logged.

Türkiye Consolidates Its Geographic Data Permit Rules

Türkiye's new geographic data regulation took effect on 14 October 2026. It brings the previous permit and licensing regimes into a single framework. Existing permits and licences remain valid until they expire.

Some real and legal persons, including foreign ones, collect, produce, share or sell geographic data listed in the National Geographic Data Responsibility Matrix as part of their commercial activities. They must now obtain a permit from the Ministry before starting those activities. Applications are submitted through the Ministry's electronic system. Permits are granted for periods of one to five years. Certain

cases are exempt from the permit requirement. These include address information requested for invoicing purposes. They also include businesses sharing the addresses and locations of their own headquarters, branches and agencies on their websites or social media accounts.

Permit holders must submit activity reports and metadata to the Ministry's electronic system every 12 months. Upon the Ministry's request, they must also share the relevant geographic data and metadata free of charge for use in disasters and emergencies. In return, the Ministry must take measures to ensure the protection, confidentiality and security of the shared data. These measures must comply with the PDPL, the Cybersecurity Law and related legislation. Businesses relying on location-based data should therefore review whether their activities fall within the scope of the new permit requirement. They should also prepare for the ongoing reporting and data-sharing obligations.

New Regulation Brings Informed Consent for Medical Interventions Online

On 27 October 2026, the Ministry of Health's Regulation on Obtaining Informed Consent in Electronic Form ("**Regulation**") was published in the Official Gazette. It entered into force on the same date. Informed consent for medical interventions at primary, secondary and tertiary healthcare facilities was previously given on paper with a wet signature. The Regulation now allows such consent to be obtained electronically as an alternative.

Under the new framework, patients can review consent forms via e-Nabız or through a link sent to their verified mobile number. They approve the intervention with a one-time SMS code. The patient enters the code directly or, where the facility's own device is used, the healthcare professional enters it. The identities of both the patient and the healthcare professional must be verified beforehand. Verified mobile numbers remain valid for 12 months. Completed forms are stored in the Ministry's central health data system, and patients can access them through e-Nabız. For minors and persons under guardianship, legal representatives give consent. The electronic route is unavailable if a representative is absent or cannot be verified.

The Regulation also sets out record-keeping and data security requirements. Consent and verification details must be logged. Audit trails must be preserved with data integrity values and time stamps. Retention periods are aligned with those for paper records. The core principles of informed consent remain unchanged. However, the Regulation introduces a new compliance layer for healthcare providers, particularly for the processing and protection of health data in electronic consent processes.

The DPA Announced the Following Data Breach Notifications in October

Data Controller (and sector)	Affected Data Subjects	Affected Personal Data Categories	Number of Data Subjects
PCT Yazılım Danışmanlık Telekominikasyon Pazarlama Ticaret A.Ş.	Not yet been determined.	» Performance Evaluation Data (*including data on copies of old-type identity cards kept in personnel files*), » Resumes (CV) of individuals who applied for a job with the data controller, » Call Detail Records (*CDR – data consisting solely of the* calling *or called telephone number, not associated with any other personal data*) and Call Audio Recordings of individuals who called, or were called by, the data controller's call center within the scope of call center services.	Not yet been determined. **Data subjects seeking further information about the incident may contact the following email address: info@procat.com.tr, telephone number: 0 216 538 19 00, and the headquarters of the data controller company.*
PCX Operasyon Yazılım ve Danışmanlık Hizmetleri A.Ş.	Not yet been determined.	» Performance Evaluation Data and Human Resources Personnel File Data of the data controller's employees (*including data on copies of old-type identity cards kept in personnel files*), » Resumes (CV) of individuals who applied for a job with the data controller, » Call Detail Records (*CDR – data consisting solely of the calling or called telephone number, not associated with any other personal data*) and Call Audio Recordings of individuals who called, or were called by, the data controller's call center within the scope of call center services.	Not yet been determined. **Data subjects seeking further information about the incident may contact the following email address: info@procat.com.tr, telephone number: 0 216 538 19 00, and the headquarters of the data controller company.*

Data Controller (and sector)	Affected Data Subjects	Affected Personal Data Categories	Number of Data Subjects
Procat Teknoloji Danışmanlık Hizmetleri A.Ş.	Not yet been determined.	» Performance Evaluation Data and Human Resources Personnel File Data of the data controller's employees (*including data on copies of old-type identity cards kept in personnel files*), » Resumes (CV) of individuals who applied for a job with the data controller, » Call Detail Records (*CDR – data consisting solely of the* calling *or called telephone number, not associated with any other personal data*) and Call Audio Recordings of individuals who called, or were called by, the data controller's call center within the scope of call center services.	Not yet been determined. **Data subjects seeking further information about the incident may contact the following email address: info@procat.com.tr, telephone number: 0 216 538 19 00, and the headquarters of the data controller company.*
Procatcx Operasyon Yazılım ve Danışmanlık Hizmetleri Anonim Şirketi	Not yet been determined.	» Performance Evaluation Data and Human Resources Personnel File Data of the data controller's employees (*including data on copies of old-type identity cards kept in personnel files*), » Resumes (CV) of individuals who applied for a job with the data controller, » Call Detail Records (*CDR – data consisting solely of the calling or called telephone number, not associated with any other personal data*) and Call Audio Recordings of individuals who called, or were called by, the data controller's call center within the scope of call center services.	Not yet been determined. **Data subjects seeking further information about the incident may contact the relevant parties at the following address: Halide Edip Adıvar Mah. Sultan Sok. No:28, Kut Yapı İş Merkezi, Kat:4-5, Şişli, İstanbul, via email at destekaskinisantasi@hotmail.com, or by telephone at 0850 305 6027.*
GIG Sigorta A.Ş.	Customers	» *Identity* Data » Contact *Data* » *Customer* Transaction Data	Not yet been determined.
Monnalisa Bebek Giyim Sanayi ve Ticaret A.Ş.	Not yet been determined.	» Not yet been determined.	Not yet been determined.

Data Controller (and sector)	Affected Data Subjects	Affected Personal Data Categories	Number of Data Subjects
Yıldız Teknik Üniversitesi	Students, employees and visitors	» Not yet been determined.	140,000 students, 4,500 employees and the number of the affected visitors not yet been determined.
D Elektronik Şans Oyunları ve Yayıncılık A.Ş.	Customers (*who are either called the call centre or called by the call centre*) and potential customers	» Identity Data(*name, surname, information requested for identity verification purposes*), » Contact *Data* (*phone numbers*) » Customer Transaction *Data* (*content of requests and complaints, transaction information*) » Audio – Visual *Recordings* (*audio recordings*)	Not yet been determined. * *Data subjects seeking further information about the incident may contact the data controller via the call center at 0850 558 0 558, the "Bize Yazın" (Write to Us) channel, the customer service messaging channel or the following email address: destek@nesine.com. For the exercise of their rights under Article 11 of Law No. 6698, data subjects may contact the data controller via the following email address: kvkk@nesine.com, or the application form on its websites.*
4 Race Teknoloji ve Yazılım A.Ş.	Customers (*who are either called the call centre or called by the call centre*) and potential customers	» Identity Data(*name, surname, information requested for identity verification purposes*), » Contact Data (*phone numbers*) » Customer Transaction Data (*content of requests and complaints, transaction information*) » Audio – Visual *Recordings* (*audio recordings*)	Not yet been determined. * *Data subjects seeking further information about the incident may contact the data controller via the call center at 0850 202 0 558, the "Bize Yazın" (Write to Us) channel, the customer service messaging channel or the following email address: destek@atyarisi.com. For the exercise of their rights under Article 11 of Law No. 6698, data subjects may apply to the data controller via the application form on its websites.*
Hüşyar Tekstil Pazarlama İthalat İhracat Sanayi ve Ticaret Ltd. Şti. (https://www.barrelsandoil.com)	Users, Subscribers/ Members, Customers and Potential Customers	» Identity Data (*name, surname*), » Contact Data (*postal address, email address, phone numbers*), » User Login *Credentials* (*customer passwords, admin panel user accounts and stored password values*).	Not yet been determined. **Data subjects seeking further information about the incident may contact the data controller via the following email address: internet@barrelsandoil.com.*

Data Controller (and sector)	Affected Data Subjects	Affected Personal Data Categories	Number of Data Subjects
Ortadoğu Holding A.Ş.	Customers, Employees and Users	» Contact *Data* » Location *Data* » *Employee* Data (*professional experience*), » Legal *Transaction* Data, » Risk Management Data, » Finance Data, » Marketing Data » Audio-Visual Records	Not yet been determined.
Medikalyapı Sağlık Yatırımları A.Ş.	Customers, Employees and Users	» Contact Data » Location Data » Employee Data » Legal Transaction Data, » Risk Management Data, » Finance Data, » Marketing Data » Audio-Visual Records	Not yet been determined.
Gür Grup İnşaat Sanayi ve Ticaret A.Ş.	Employees and Users	» Contact Data » Location Data » Employee Data » Audio-Visual Records	Not yet been determined.
Smart Delivery Pizza Yemekçilik Gıda E-Ticaret Reklamcılık ve Ticaret Ltd. Şti.	Customers and Employees	» Identity Data, » Contact Data, » Location Data, » Customer Transaction Data, » Finance Data.	Not yet been determined.
DDP Temizlik Pizza Gıda Sanayi ve Ticaret Ltd. Şti.	Customers and Employees	» Identity Data, » Contact Data » Location Data, » Customer Transaction Data, » Finance Data.	Not yet been determined.
Deniz Pizza Restoranları ve Ticaret Ltd. Şti.	Customers and Employees	» Identity Data » Contact Data » Location Data » Customer Transaction Data » Finance Data	Not yet been determined.
Dodo Brands International FZCO	Customers and Employees	» Identity Data » Contact Data » Location Data » Customer Transaction Data » Finance Data	Not yet been determined.

Data Controller (and sector)	Affected Data Subjects	Affected Personal Data Categories	Number of Data Subjects
Ondokuz Mayıs Üniversitesi	Not yet been determined.	» Identity Data » Contact Data » Location Data	109 people
Akropol Turizm Yatırımları İnşaat ve Dış Ticaret A.Ş. (MW Phokaia Beach & Resort)	Employees of the data controller, Guests and Real person representatives of suppliers and business partners	» Identity Data (including reservation and accommodation data), » Contact Data, » Employee Data (*employee and contact information*), » Finance Data, » Transaction Data, » Corporate Email Correspondence Data.	Not yet been determined.
Choice Hotels International, Inc.	Customers	» Identity Data (*name, surname*), » Contact Data » Accommodation Data	9,550 people
İzmir Büyükşehir Belediyesi	Not yet been determined.	» Identity Data (*name, surname*), » Contact Data (*email address, phone* number).	Not yet been determined.
Enka Spor Eğitim ve Sosyal Yardım Vakfı	Students, Graduated Students and Children	» Identity Data (*name, surname, date and place of birth, nationality, passport number and photograph information contained in passport copies of teachers, students and graduates*), » Audio - Visual Records (*event photographs and passport photographs archived on the server)*	Not yet been determined.
DNC Sağlık Hizmetleri A.Ş.	Patients, Relatives of the Patients, Employees and Business Partners	» Identity Data (*name, surname, Turkish national identification number*), » Contact Data (*phone number, e-mail address, address of residence*) » Health Data (*health records relating to examinations, laboratory tests, diagnostic tests, diagnoses, prescriptions and medical treatment history*), » Finance Data (*appointment records, billing records and SGK/private insurance provision records*)	Not yet been determined.

Data Controller (and sector)	Affected Data Subjects	Affected Personal Data Categories	Number of Data Subjects
Baxter Turkey Renal Hizmetler A.Ş.	Not yet been determined.	» Identity Data (*name, surname*), » Contact Data (*email address*),	Not yet been determined.
Kurukahveci Mehmet Efendi Mahdumları Gıda Sanayi ve Ticaret A.Ş.	Customers	» Identity Data (*name, surname*), » Contact Data (*address of residence, email address, phone number*) » User Login Credentials	15,303 people ** Data subjects seeking further information about the incident may contact the data controller via the following email address: kvkk@mehmetefendi.com.*
Güllüoğlu Gıda Sanayi ve Ticaret A.Ş.	Users	» Identity Data (*name, surname*), » Contact Data (*address of residence, email address, phone number*) » User Login Credentials	67,193 people ** Data subjects seeking further information about the incident may contact the data controller via the call center at 0212 225 52 82, the following email address: info@karakoygulluoglu.com, and the website: https://www.karakoygulluoglu.com/.*
Dermojet Sağlık Ürünleri Sanayi ve Ticaret A.Ş.(https://www.dermojet.com.tr/)	Customers and Potential Customers	» Identity Data (*name, surname*), » Contact Data (*address of residence, email address, phone number*) » User Login Credentials	50,636 people *Data subjects seeking further information about the incident may contact the data controller via the following email address: info@dermojet.com.tr, telephone number: (0530) 738 29 87, and the website: dermojet.com.tr*
Asyaport Liman A.Ş.	Employees, Users and Customers	» Identity Data (*name, surname*), » Contact Data (*address of residence, email address, phone number*)	855 people ** Data subjects seeking further information about the incident may contact the data controller via the following email address: kvkk@asyaport.com, and the call center at 0282 273 27 92.*
Anadolu Planet Elektronik Ticaret A.Ş. (https://ww.elevti.com/)	Employees, Users, and Subscribers/ Members	» Identity Data (*name, surname*), » Contact Data (*address of residence, email address, phone number*) » User Login Credentials	592 people ** Data subjects seeking further information about the incident may contact the data controller via the following email address: info@elevti.com, and telephone number/WhatsApp: 0850 640 13 35.*

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.

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