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DATA & TECHNOLOGY LAW BULLETIN

SEPTEMBER 2025

LATEST NEWS

- In The Medium-Term Program for the 2026-2028 period, The planned preparations and developments regarding the KVKK's compliance with the GDPR and artificial intelligence are published in the Official Gazette.
- A cyber espionage operation targeting illegal interrogation systems that target personal data was conducted under the coordination of the National Intelligence Organization (MİT).
- The bulletin titled 'Protection of Personal Data on Social Media', which is published every three months by the Personal Data Protection Authority, has been released.
- Personal Data Breach Reported in September

GLOBAL NEWS

- Italy became the first EU member state to adopt comprehensive AI regulations in line with the EU AI Act.
- RTÉ Prime Time Data Breach Investigation
- The UK Information Commissioner's Office (ICO) has shared a number of recommendations to help small businesses strengthen their cybersecurity.

TOWARDS EU STANDARDS IN DATA PROTECTION LEGISLATION

The protection of personal data is of critical importance in today's rapidly digitalizing world, both in terms of individuals' fundamental rights and the sustainability of organizations. Considering global data processing standards, achieving the highest possible level of compliance with the European Union's General Data Protection Regulation (GDPR) is becoming an increasingly unavoidable necessity.

Recently, various legal and technical efforts have been underway in Turkiye, both in public institutions and the private sector, to bring the Personal Data Protection Law (KVKK) into line with the GDPR. In this process, the aim is to impose stronger obligations on data controllers in areas such as transparency, accountability, and access to the rights of data subjects.

In this context, the likely changes in data protection legislation necessitate new compliance strategies not only from a legal perspective but also from an operational, technological, and managerial standpoint. It is crucial for data controllers to be prepared for this transformation in order to achieve sustainable compliance. Closely monitoring these developments in the coming period will be a critical step not only for managing legal risks but also for building digital trust.

LATEST NEWS

PLANNED PREPARATIONS AND DEVELOPMENTS REGARDING THE ALIGNMENT OF THE KVKK WITH THE GDPR AND ARTIFICIAL INTELLIGENCE IN THE 2026–2028 MEDIUM-TERM PROGRAM PUBLISHED IN THE OFFICIAL GAZETTE

This program anticipates that the process of aligning the KVKK with the GDPR and bringing it into compliance with the EU Artificial Intelligence Regulation will be completed by the end of 2026.

Some of the noteworthy issues regarding digital transformation and data privacy in this Medium-Term Program for the 2026-2028 period, published in the Official Gazette, are as follows:

- Plans have been made to include Artificial Intelligence in many areas and to develop its use in these areas.
- Support will be provided for the capabilities and capacities of companies, particularly SMEs, to undergo digital transformation, and the maximum use of digital technologies in the development of public services will contribute to sustainable growth.

- To accelerate the transition to a data economy, a national policy framework covering data ownership and sharing responsibilities as well as technical methods will be prepared, and a data governance umbrella legislation and infrastructure will be established.
- Legislative regulations required in the field of cybersecurity will be prepared in line with EU acquis.
- The National Data Strategy and Action Plan will be implemented to develop data-driven decision-making mechanisms and establish a governance framework that safeguards data privacy and security.
- The Artificial Intelligence Strategy will be updated.
- You can access the relevant Medium-Term Program here.

LATEST NEWS

CYBER ESPIONAGE OPERATION AGAINST ILLEGAL INQUIRY SYSTEMS TARGETING PERSONAL DATA, COORDINATED BY THE NATIONAL INTELLIGENCE ORGANIZATION (MIT)

Under the coordination of the National Intelligence Organization (MİT), the following statements were included in the September 30, 2025, Hürriyet newspaper report regarding a cyber espionage operation targeting illegal interrogation systems that target personal data:

Under the coordination of MİT, an operation was carried out in cooperation with the General Command of Gendarmerie, the National Cyber Incident Response Center (USOM), and the Financial Crimes Investigation Board (MASAK) to protect the personal data of citizens of the Republic of Turkey.

As part of the investigation conducted by the Ankara Chief Public Prosecutor's Office, a detention order was issued for suspects who accessed citizens' personal data through illegal means.

In simultaneous operations carried out in Istanbul, Şanlıurfa, İzmir, and Kütahya, suspects, including the administrators and developers of illegal query systems, were detained.

Three of the suspects were arrested by the court and sent to prison, while two were released under judicial control.

With technical support from USOM, the infrastructure used by cybercriminals was uncovered, while investigations conducted by MASAK revealed the organization's illegal sources of income and money flows.

The personal data obtained as a result of the investigations was found to have been transferred to foreign connections as part of espionage activities.

A total of nine websites, including illegal query panels, were seized and shut down as part of the operation.

Telegram groups and channels used by the suspects for illegal communication were also seized. Security forces shared a message in Telegram groups stating their “determination to combat cyber espionage activities and illegal interrogation systems” and blocked access to these groups.

You can access the related news here.

LATEST NEWS

PERSONAL DATA BREACH REPORTED IN SEPTEMBER
Sinch AB

The data breach notification submitted to the Board by Sinch AB (Lindhagensgatan 74, vån 7., 112 18, Stockholm, Sweden), acting as the data controller, summarized as follows:

- The breach occurred between August 28, 2025, and August 30, 2025, through computer hacking,
- The group of individuals affected by the breach were users,
- The personal data affected by the breach included names, email addresses, addresses, the last 4 digits of credit cards, card types (Visa, Mastercard, etc.), and credit card expiration dates,
- The number of individuals affected by the breach was 716.
- While the investigation into the matter is ongoing, the Personal Data Protection Board's Decision No. 2025/1755 dated 23.09.2025 has decided that the data breach notification in question should be published on the Authority's website.

Only 1 data breach was reported for September 2025.

You can access the relevant breach notification here.

The bulletin titled 'Protection of Personal Data on Social Media', which is published every three months by the Personal Data Protection Authority, has been released.

The 9th issue of the KVKK Bulletin, prepared by the Personal Data Protection Authority at three-month intervals, has been published on the topic of “Protection of Personal Data on Social Media.” This issue includes:

- An opinion piece titled “The Two Faces of Social Media: Freedom of Communication and the Shrinking Boundaries of Privacy”
- Prominent Platform Types on Social Media
- An article titled “A Study on the Protection of Personal Data on Social Media”
- Recommendations for Parties Processing Personal Data in Mobile Applications
- Protection of Personal Data within the Scope of the “Corporate Social Media Usage Guide for Public Institutions”
- Parent Sharing (Sharenting) on Social Media
- Recommendations for Parents Regarding Children's Use of Social Media
- For Safer Social Media Use...
- Noteworthy Developments Regarding the Protection of Personal Data
- News from Us, are included.

You can access the relevant newsletter here.

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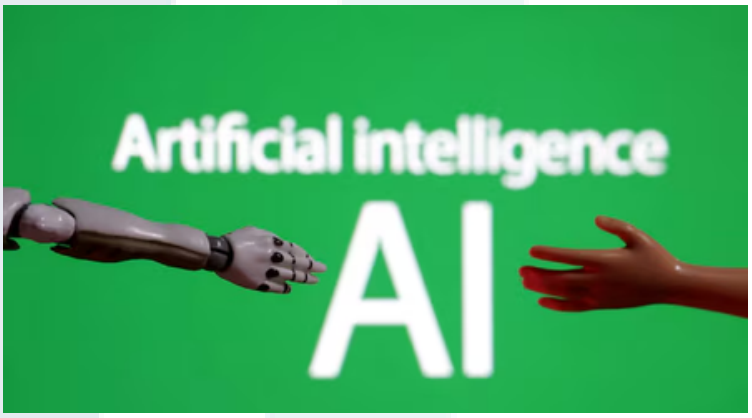
GLOBAL NEWS

ITALY BECAME THE FIRST EU MEMBER STATE TO ADOPT COMPREHENSIVE AI REGULATIONS IN LINE WITH THE EU AI ACT



Italy became the first EU member state to adopt comprehensive AI regulations in line with the EU AI Act. The law aims to prevent harmful AI content, particularly deepfakes, introduce cross-sector requirements for AI data processing, and ban AI use for children under 14.

Prime Minister Giorgia Meloni's government spearheaded the bill, stating that it has established human-centered, transparent, and secure AI use as fundamental principles and emphasized innovation, cybersecurity, and privacy protections.

The law introduces cross-sectoral rules covering health, work, public administration, justice, education, and sports.

It also restricts access to artificial intelligence for those under 14 years of age to parental consent.

Deputy Minister for Digital Transformation Alessio Butti said, “This (law) brings innovation back into the public interest framework, directing artificial intelligence towards growth, rights, and the full protection of citizens.”

You can access the related news here.

RTÉ PRIME TIME DATA BREACH INVESTIGATION

RTÉ Prime Time investigation reveals location data of thousands of smartphones for sale in Ireland.

According to RTÉ Prime Time's investigation, it was alleged that the sensitive location data of smartphone users in Ireland could be purchased from data brokers. An Irish Data Protection Commission official stated:

“We are currently trying to identify the relevant data broker; if they have headquarters in Ireland, we will take action ourselves.”

Individual phones in the data could be tracked to specific residential addresses after entering high-security prisons, military bases, and Leinster House, as well as sensitive locations such as health clinics and mental health facilities.

The data available for purchase showed the minute-by-minute movements of the phones, and the provided locations were specific enough to reveal the movement patterns within residential addresses as well as the lifestyle patterns of the smartphone owner.

You can access the related news article here.

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GLOBAL NEWS

UK INFORMATION COMMISSIONER'S OFFICE RECOMMENDATIONS FOR SMALL BUSINESSES TO STRENGTHEN THEIR CYBERSECURITY

The UK Information Commissioner's Office (ICO) has shared a number of recommendations to help small businesses strengthen their cybersecurity. These recommendations include:

- Backing up data regularly and ensuring that these backups work,

- Using strong passwords and implementing multi-factor authentication where possible,

- Paying attention to what is said and what is visible on screens, especially in crowded and public environments,

- Being cautious about suspicious emails and raising employee awareness on this issue,

- Installing anti-virus and malware protection software on devices and keeping it up to date,

- Locking the screen when leaving the device unattended for a short period of time and storing the device securely when leaving it unattended for a longer period of time.

- Ensuring that the Wi-Fi connection is secure,

- Implement access controls to ensure that employees can only access information relevant to their duties,

- Close unnecessary tabs/documents and disable notifications before screen sharing in online meetings,

- Taking care to protect the privacy of recipients when sending emails to multiple people and evaluating secure bulk email methods,

- Storing personal data only for as long as necessary,

- Securely disposing of old information technology equipment and records in a manner that does not leave personal data behind.

It should be noted that, regardless of the nature of the business activity, compliance with these recommendations by businesses will significantly contribute to data security.

You can access the relevant recommendation text here.

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