

Turkey's law on regulation of publications on the internet and suppression of crimes committed by means of such publications has had a sweeping impact on our lives since 2007, and further restrictions have been introduced with each revision. The scope of the law was once again expanded with a new revision on July 29, 2020. In a striking move, the latest revision introduced a new level of barrier to access to news and information - now the authorities may request removal of content from publishing platforms instead of merely blocking access to the content. The new legislation will have significant repercussions on digital rights and freedoms, e-commerce, economy and young entrepreneurs. It has been long argued that press freedom will definitely be one of the primary targets of the legislation. Media Research Association (MEDAR) has been following the drafting process of the 2020 update to the legislation. We analyzed the potential impact of the new provisions in our broadcasts on various platforms.

Many argue that the law may lead to significant concerns under article 10 of the European Convention on Human Rights, which guarantees the freedom to hold opinions and to express them freely without government intervention. As a matter of fact, since its full enforcement on October 1, 2020, it has had a major impact on the sustainability of digital content, particularly at news outlets.

While similar legislation in many countries is based on claims of "digital sovereignty", Turkish authorities often cited allegations of "digital terrorism" and "security of private data" when drafting the revisions. The revised draft was rushed through the deliberation processes at the commission and parliament and was ratified almost overnight. The new legislation requires global social media platforms to assign legal representatives in Turkey and to store user data locally. It virtually creates an approval mechanism with control over the content that can be viewed by users in Turkey, and requires online media platforms to remove unwanted content when requested. Under the new legislation, at least 658 requests have been submitted to news outlets to remove digital content on various themes, including corruption and irregularities, sabotage, harassment, fraud and political conflict. Dozens of notifications were sent by authorities to the email addresses of media outlets, with the subject line reading "content removal order".

To have a better insight about how the new law, which is commonly known as the “Social Media Law”, has affected media outlets, we conducted a research covering the six-month period from October 2020 to May 2021. The findings gathered during the analysis of content removal requests received by 35 national media outlets were summarized under 4 main chapters and 12 categories. In the scope of this research, we primarily focused on the news articles that were removed and the impact of the law on press freedom. Therefore, the individuals who were mentioned in these news articles were not included in our monitoring process. Nevertheless, the most commonly used justification for content removal requests was the “violation of personal rights”, with 90% of all requests mentioning this argument, although the term is vaguely defined in the Turkish Criminal Code.

As the first anniversary of the law approaches, this report aims to offer an understanding of its impact of on press freedom and citizens’ right to access news and information. We will keep monitoring and reporting on this issue to raise public awareness on digital rights and freedoms. We hope this report will be appreciated by news platforms that defend the society’s right to access information, and will strengthen the efforts to guarantee digital rights and freedoms in Turkey.

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Project Director

Media Research Association - MEDAR

RESEARCH METHOD

The aim of the Research to Monitor the Impact of the Social Media Law on Press Freedom is to understand how independent media outlets have been affected by Turkey’s Social Media Law, which was ratified in July 2020 and went into execution on October 1, 2020, and to identify the associated violations of rights and freedoms, including the right to access information, press freedom and freedom of expression.

The preparation for the research started in February 2021, and the aim was to retrospectively compile “content removal requests” that were received by media outlets since October 2020. The news items that were processed and disaggregated in the scope of this research were targeted by content removal requests from October 2020 to April 2021.

In this context, all media outlets operating in Turkey, without any discrimination, were contacted via e-mail or phone, and, after being informed about the research, they were asked to disclose “content removal requests” they received from the authorities. However, it should be noted that many news organizations in Turkey opted not to participate in the research.

Nevertheless, dokuz8HABER news portal, BirGün daily, Evrensel daily and Artı Gerçek accepted to take part in this research and shared with us the takedown requests they received. These requests often contained references to similar requests sent to other news outlets, which helped build a comprehensive framework for the research.

The media outlets that were screened for this research were chosen among those which were frequently mentioned in content removal requests. The list offered here covers the majority of the media outlets that publish news in Turkey. In this context, a screening list comprising 35 news outlets was created.

In the scope of the research, a total of 658 content removal requests were reviewed. A four-pillar methodology was developed to classify the news articles by subject, by the position of the actors/complainants mentioned in the news article, by the justifications cited in removal requests and by the organizations receiving the request. All content removal requests were classified by this method. This helped us identify the qualitative weight of content removal requests in diverse areas and compositions.

It should also be noted that the actors/complainants were analyzed according to their public/professional positions and all other ‘personal data’ was excluded from the analysis. In fact, the fundamental objective of this research is to offer a general framework on the restricting impact of the social media law on press freedom, rather than focusing on individuals.

Besides, the news articles which were targeted by the authorities in content removal requests were accessed via the internet, and these articles were classified by theme and subject. New categories were created for the themes that were repeated in multiple content removal requests. In this context, news items were grouped under 12 categories. There was not sufficient information about the themes of several news articles, which were categorized as 'unknown'. The news articles which addressed more than one subject and thus could not be categorized under one theme were included in multiple categories.

Finally, the justifications for content removal requests were also categorized into groups. During this stage, the categories were directly extracted from the content removal requests. Thus, ten categories were identified for justifications. The requests which did not include sufficient data to reveal the justification were categorized as 'unknown'. If a content removal request contained references to more than one justification, it was classified in multiple categories.

SUBJECT OF NEWS ARTICLES

In the scope of the Research to **Monitor the Impact of Social Media Law on Press Freedom**, the news content that were targeted by content removal requests were categorized into 12 groups, which are: 'corruption and irregularities', 'misconduct', 'political conflict', 'murder', 'environmental damage', 'harassment', 'sabotage', 'assault and bodily harm', 'suicide', 'aggravated fraud', and 'gambling', which is described as a misdemeanor. The content removal requests which did not include sufficient data about the content of the news article were labeled as 'unknown.' The categories used for analysis and classification were created on the basis of the definitions given below:

Corruption, according to Kaufman and Vicente (2005), is defined as using public positions or policies to further 'personal benefits.' In the framework of this research, the concept of 'corruption' was construed as "using or allowing others to use the state's authorities or the position held within the state structure or the position as a decision-maker to unlawfully bend, bypass or violate applicable procedures/legislation and other rules to offer benefits to certain individuals, groups, communities, institutions or other parties."

Misconduct is defined as an offense in the Turkish Criminal Code. According to volume II of the Code, misconduct refers to acts aimed at the detriment of individuals or the public, or failing to fulfill 'required duties of a public position or seeking 'benefits' from such position (Okuyucu-Ergün, 2009).

The **political conflict** category addresses content removal requests on news articles covering court cases related to personal conflict/infighting between the actors in Turkey's political domain.

Content removal requests placed against news articles related to killings of people or animals are classified under the category of **murder**.

Harassment refers to any disturbing sexual act, behavior, discourse or any other conduct that may not necessarily violate physical integrity of a person.

The concept of **sabotage** was used to label the news articles about actions aimed at deliberately disrupting or disabling a plan or an entity.

The news articles which were related to actions aimed at causing bodily harm on a person or affecting their physical or cognitive health were compiled under the category of **assault and bodily harm**.

The news articles about persons ending their own life were grouped under the **suicide** category, and the articles about individuals committing fraud against third parties by using religious, social, professional or technological means or public institutions were gathered under the **aggravated fraud** theme. The news articles reporting claims of gambling or enabling others gamble were collected under the category of **gambling**, which is legally considered as a misdemeanor.

Grand total

In the scope of the research, 658 content removal requests were reviewed. The majority of these requests were placed to remove news articles about '*corruption and irregularities*' (336 items) and '*misconduct*' (308 items). The other themes are: '*Murder*' (34 items), '*political conflict*' (30 items), '*assault and bodily harm*' (22 items), '*harassment*' (14 items), '*suicide*'

(11 items) ‘*gambling*’ (9 items), ‘*aggravated fraud*’ (5 items), ‘*environmental damage*’ (4 items) and ‘*sabotage*’ (1 item). There were no details available about the content of 12 news items for which takedown requests were placed.

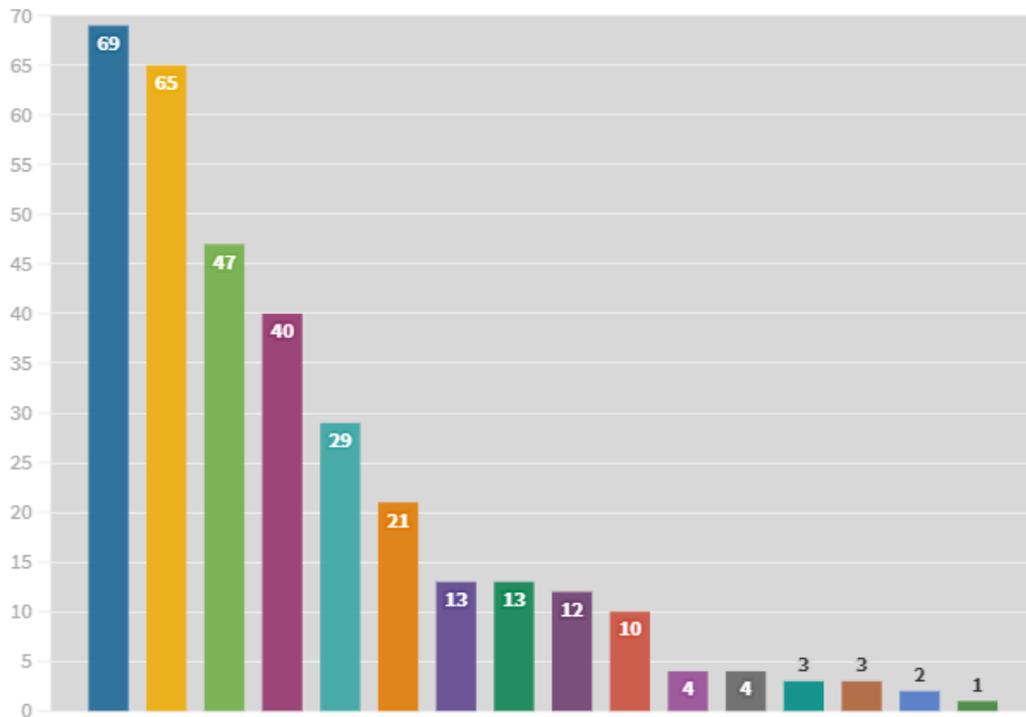
Distribution of News Topics Requested to be Taken Down



Research data demonstrates that the majority of the complainants who went to court to take down news articles about corruption and irregularities were **business people** (69 items) and **senior bureaucrats** (65 items). The other complainants who requested removal of online content describing corruption and irregularities include **lawyers** (47 items), **ministers** (40 items), **businesses** (21 items) and **prosecutors** (13 items).

Vocational Positions of Complainants Regarding News of Corruption and Irregularities

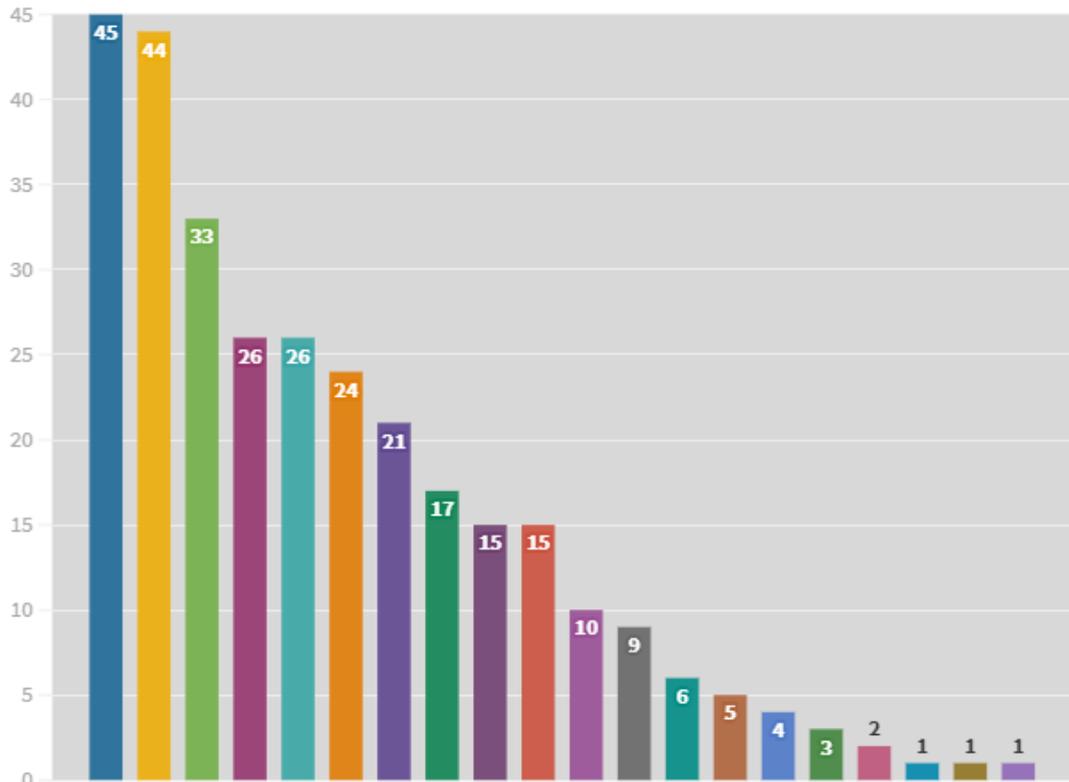
■ Businessperson ■ Senior Bureaucrat ■ Lawyer ■ Minister ■ Unknown ■ Company ■ Public Prosecutor ■ Mayor
■ Bank Executive ■ Member of the Parliament ■ Senior Member of Political Party ■ Athlete ■ Former Mayor ■ Judge
■ University ■ Deputy Governor



The complainants who placed takedown requests against news reports on misconduct include: **Senior bureaucrats** (45 items), **ministers** (44 items), **senior members of political parties** (33 items), **business people** (26 items), **academics** (26 items), **lawyers** (24 items) and **mayors** (17 items).

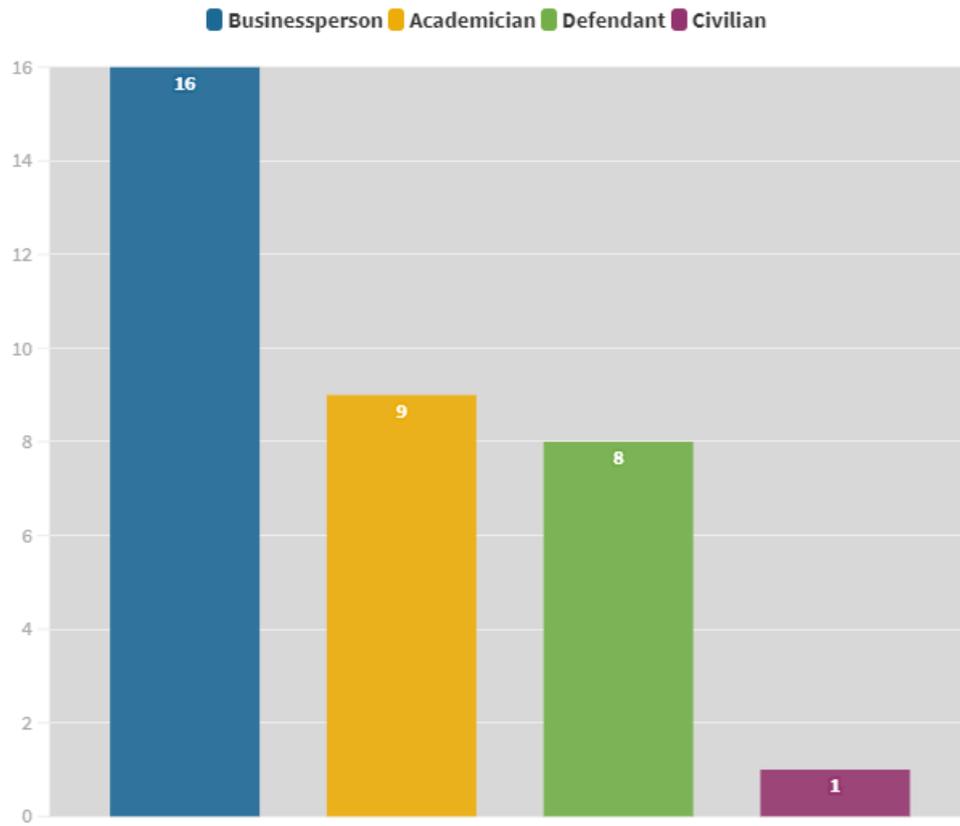
Vocational Positions of Complainants Regarding News of Misconduct

■ Senior Bureaucrat ■ Minister ■ Senior Member of Political Party ■ Businessperson ■ Academician ■ Lawyer ■ Unknown
■ Mayor ■ Judge ■ District Governor ■ Senior Military Official ■ Public Prosecutor ■ Deputy Governor
■ Member of the Parliament ■ Athlete ■ Civil Servant ■ University ■ Bureaucrat ■ Deputy Prosecutor ■ Chief Physician

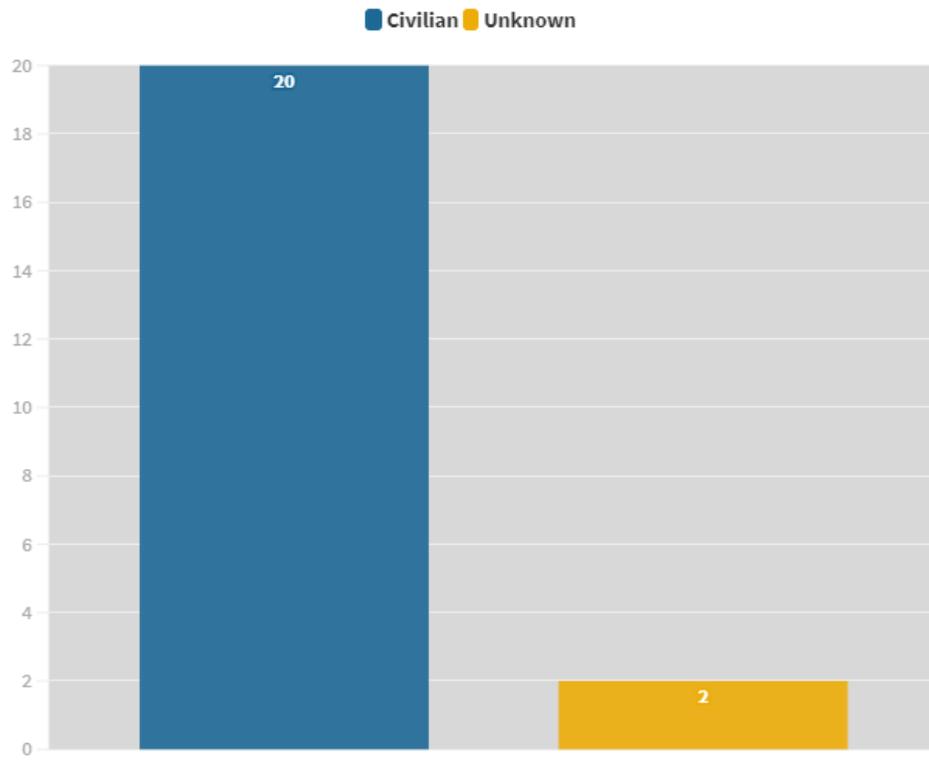


The complainants who filed petitions to remove news pieces on murder include **business people** (16 items) and **academics** (9 items). All of the individuals who requested removal of news on political conflict were **ministers** (30 items). The individuals who targeted news content on assault and bodily harm were almost exclusively **civilians** (20 items). The majority of the individuals who requested the removal of news pieces on harassment were **senior members of political parties** (6 items). All of the complainants against news reports on suicide were civilians (11 items). Similarly, all complaints against news items on gambling were submitted by **artists** (9 items) and all content removal requests for news reports on environmental damage came from **businesses**. Furthermore, all of the complaints against news reports on fraud were filed by **civilians** (5 items), and the only request to remove content on sabotage came from a **business person**.

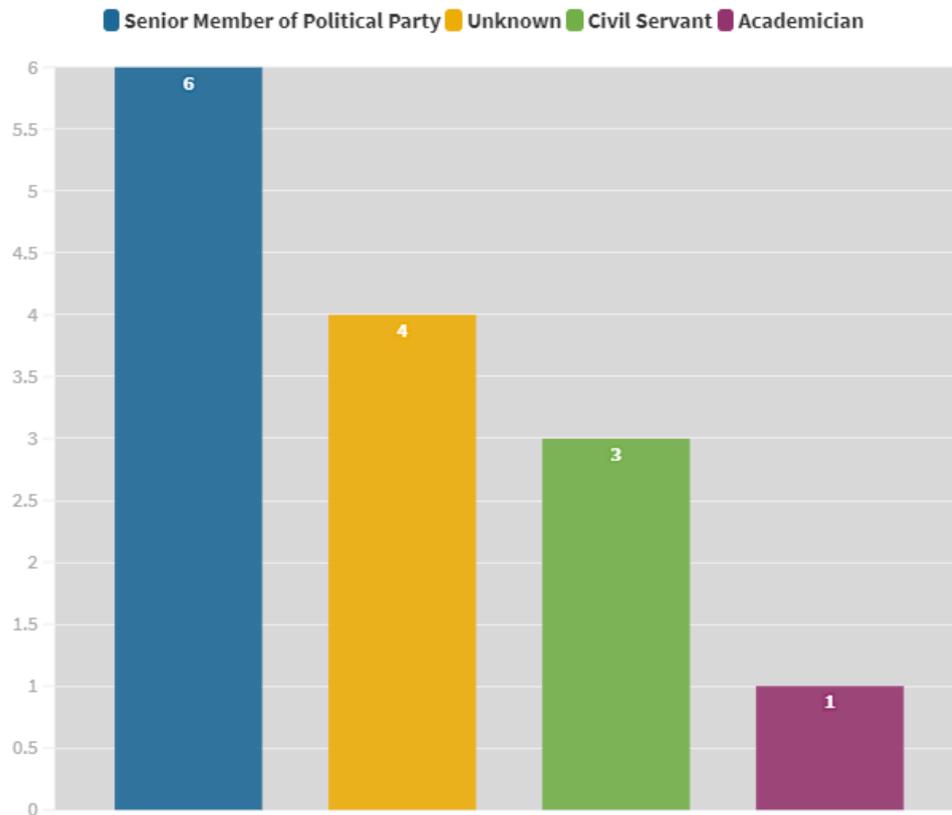
Vocational Positions of Complainants Regarding News of Murder



Vocational Positions of Complainants Regarding News of Assault and Bodily Harm



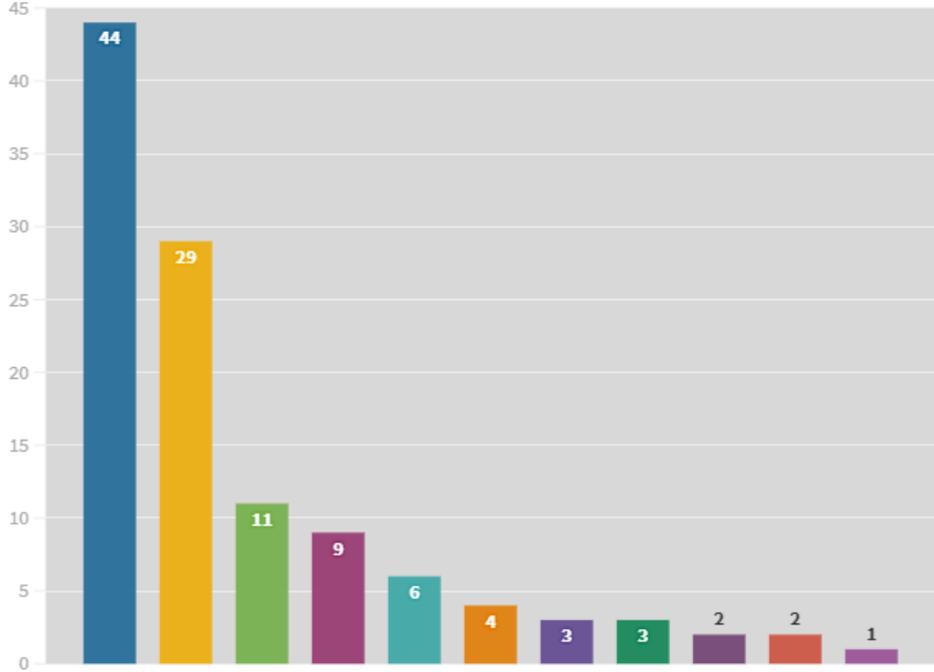
Vocational Positions of Complainants Regarding News of Harassment



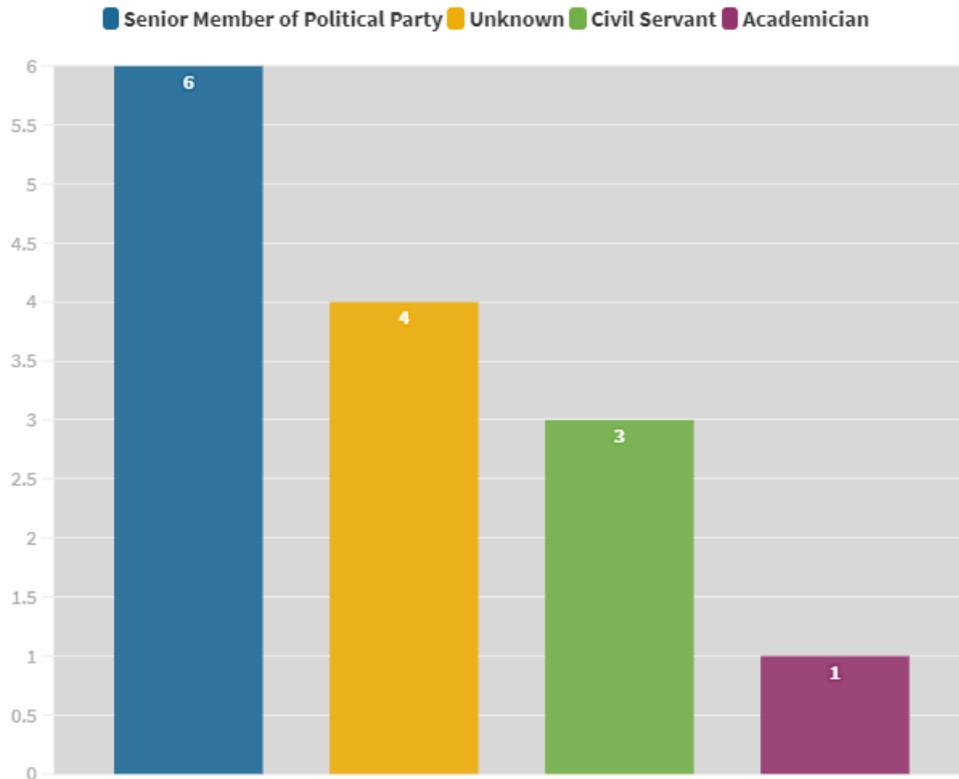
In our analysis, it was understood that the content targeted by removal requests may contain allegations of multiple offenses. For example, 114 news articles contained information about ‘*corruption and irregularity*’ as well as ‘*misconduct*’. The complainants against these news articles were mainly **senior bureaucrats** (44 items), **ministers** (29 items) and **mayors** (11 items). Besides, there were 14 news reports describing actions involving both misconduct and harassment. In this case, the majority of the complainants were **senior members of political parties** (6 items).

Vocational Positions of Complainants Regarding News of Containing Allegations of Corruption and Irregularities and Misconduct

Senior Bureaucrat Minister Mayor Businessperson Public Prosecutor Athlete Judge
Member of the Parliament University Unknown Lawyer



Vocational Positions of Complainants Regarding News of Containing Allegations of Harassment and Misconduct



JUSTIFICATIONS FOR CONTENT REMOVAL REQUESTS

In the scope of the **Research to Monitor the Impact of Social Media Law on Press Freedom**, the legal justification for content removal requests were categorized into 10 groups. These are: ‘Violation of personal rights’, ‘privacy’, ‘violation of the presumption of innocence’, ‘the right against self-incrimination’, ‘the right to be forgotten’, ‘damage to business reputation’, ‘absence of public interest’, ‘copyright violation (YouTube)’, and ‘violation of the child’s safety policy (YouTube)’. In several instances, there was not any information about the justification of content removal requests, and the news reports targeted by these requests were classified as ‘unknown’.

Violation of Personal Rights: Although the Turkish Criminal Code does not offer a clear definition of ‘personal rights’, the classification in this research was based on the following definition: “A person’s integral rights of life, physical integrity, wellbeing, dignity and honor,

name, portrait, private life, personal data and freedoms, which appertain to the person solely because the person exists, and which are protected by the legal system” (Kaya, 2010).

Privacy: In the scope of this research, privacy is defined as “the state of being concealed from others and free of outside intrusion”, “personal information which is not publicly available and which can only be obtained through targeted research and surveillance” and “aspects of a person’s confidential life which are intended to be concealed from others” (Şen, quoted by Aras, 2010).

Violation of Presumption of Innocence In this research, the presumption of innocence is defined as “*a legal principle that every person is considered innocent until proven guilty by a court decision*” (Değirmencioğlu, 2019). The violation of presumption of innocence in the media refers to incrimination of individuals without any evidence.

The Right Against Self-Incrimination: In the scope of this research, this right is defined as “*avoiding damage to the honor, dignity and reputation of a person due to a prosecution or investigation launched on the basis of a suspected crime, and avoiding from publishing any material that may bring harm to the innocence of the person and publicly convict that person without a court ruling*” (Kara, 2012, quoted by Gülsün, 2015).

The Right to Be Forgotten: In this research, Nalbantoğlu’s (2018) definition of the right to be forgotten was used. According to this definition, the right to be forgotten means “*irretrievably eliminating/deleting all disturbing personal content about an individual in digital memory upon the request of that individual.*”

Damage to Business Reputation: This right is often used by companies to control the “allegations” on the media to protect their ‘reputation’ among consumers.

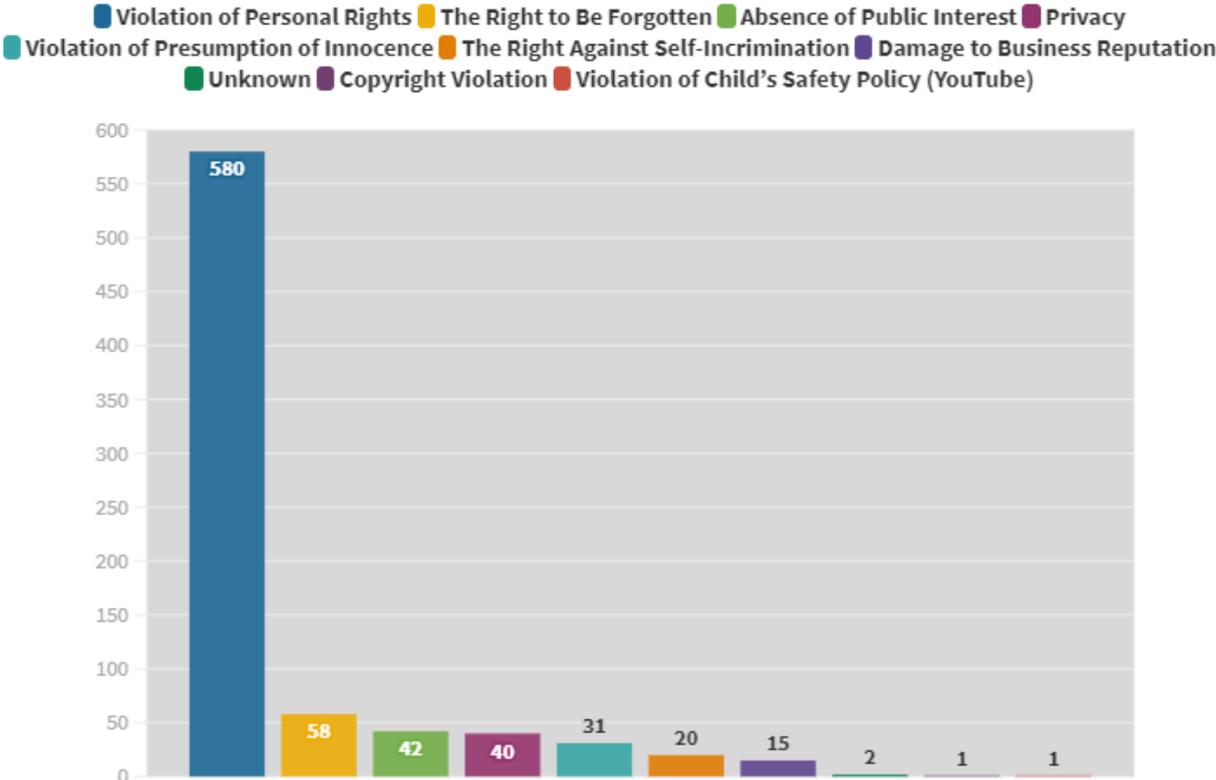
Absence of Public Interest: It can be argued that the news articles classified in this category uphold public interest. It should also be noted that “*the concept of public interest also entails discretion of the state organs*” (Gül, 2014) and the interpretation of the concept may vary depending on time and context.

Copyright Violation refers to infringement of rules safeguarding products in video, audio or other formats by content publishers on YouTube. The concept of **Violation of Child’s Safety Policy** means breach of the principle that protects minors from unwanted content on YouTube.

Grand total

In this research, 658 online news items targeted by content removal requests were reviewed. The significant majority of these requests were based on ‘*violation of personal rights*’ (580 items). The second most commonly cited justification was the ‘*right to be forgotten*’ (58 items). The other justifications are: ‘*Absence of public interest*’ (42 items), ‘*violation of privacy*’ (40 items), ‘*violation of presumption of innocence*’ (31 items), ‘*right against self-incrimination*’ (20 items), ‘*damage to business reputation*’ (15 items), ‘*copyright violation*’ (1 item), ‘*violation of child’s safety principle*’ (1 item), and ‘*unknown*’ (2 items).

Justifications for Content Removal Requests

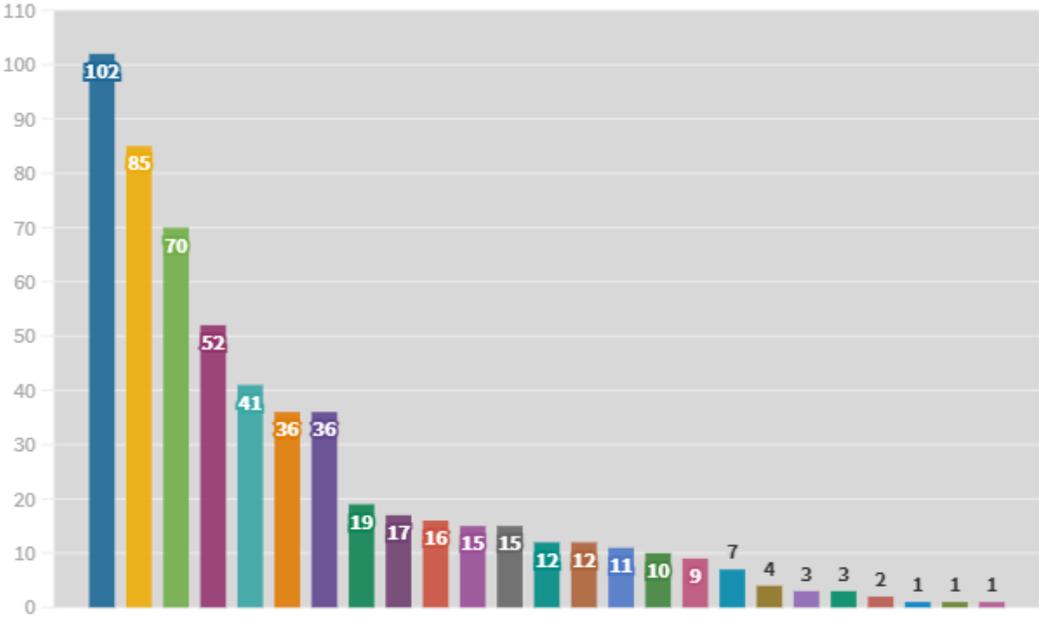


The majority of the complainants who requested removal of online content due to violation of personal rights were **business people** (102 items). The news pieces which were subject to

content removal orders due to violation of personal rights were mainly reports of ‘*corruption and irregularities*’ (68 items).

Distribution of Contents Requested to be Removed Based on Violation of Personal Rights by Vocational Positions of Complainants

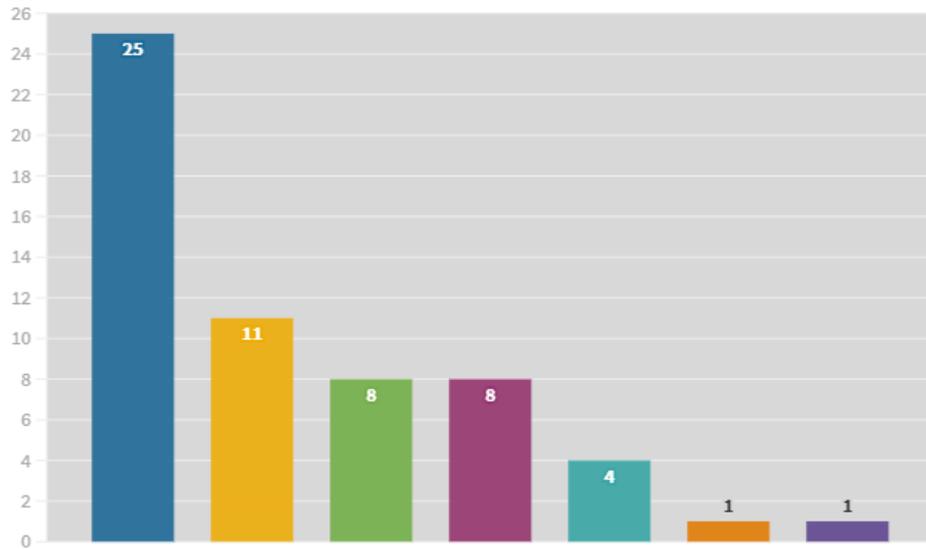
- Businessperson ■ Minister ■ Lawyer ■ Unknown ■ Senior Bureaucrat ■ Senior Member of Political Party ■ Academician
- Mayor ■ Civilian ■ Public Prosecutor ■ Judge ■ District Governor ■ Member of the Parliament ■ Bank Executive
- Company ■ Senior Military Official ■ Artist ■ Deputy Governor ■ Athlete ■ Former Mayor ■ Civil Servant ■ University
- Deputy Prosecutor ■ Bureaucrat ■ Chief Physician



The majority of the content takedown requests based on the ‘right to be forgotten’ (25 items) came from **senior bureaucrats**. Besides, all requests placed on the basis of this justification also cited ‘*violation of presumption of innocence*’. In addition, all news articles targeted on the grounds of this justification were reports mentioning both ‘*corruption and irregularities*’ and ‘*misconduct*’.

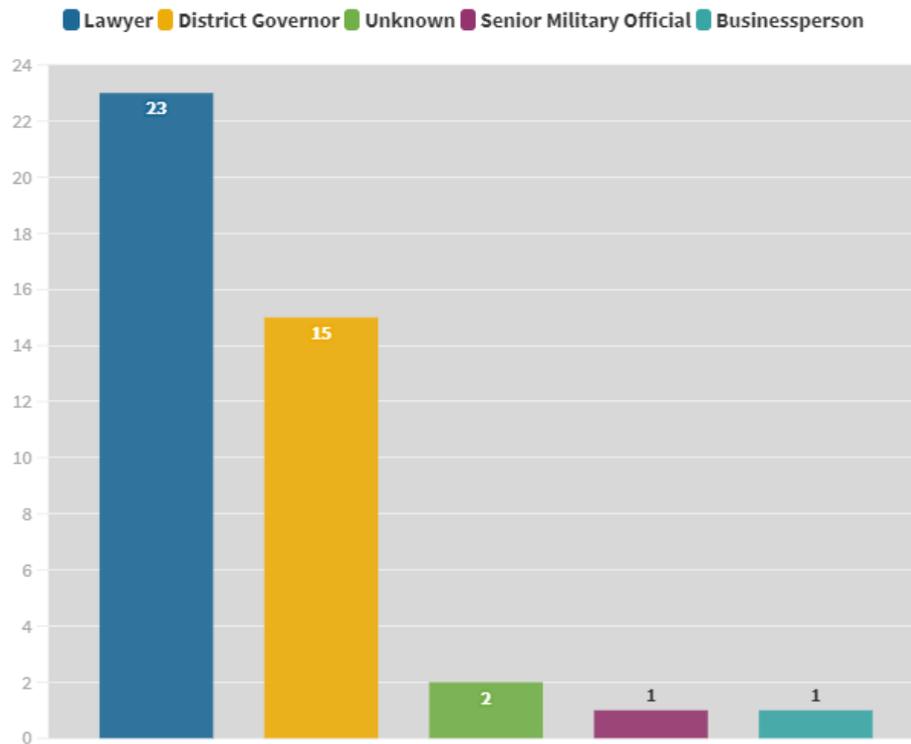
Distribution of Contents Requested to be Removed Based on The Right to Be Forgotten by Vocational Positions of Complainants

■ Senior Bureaucrat ■ Senior Member of Political Party ■ Defendant ■ Senior Military Official ■ Company ■ Mayor ■ Civilian



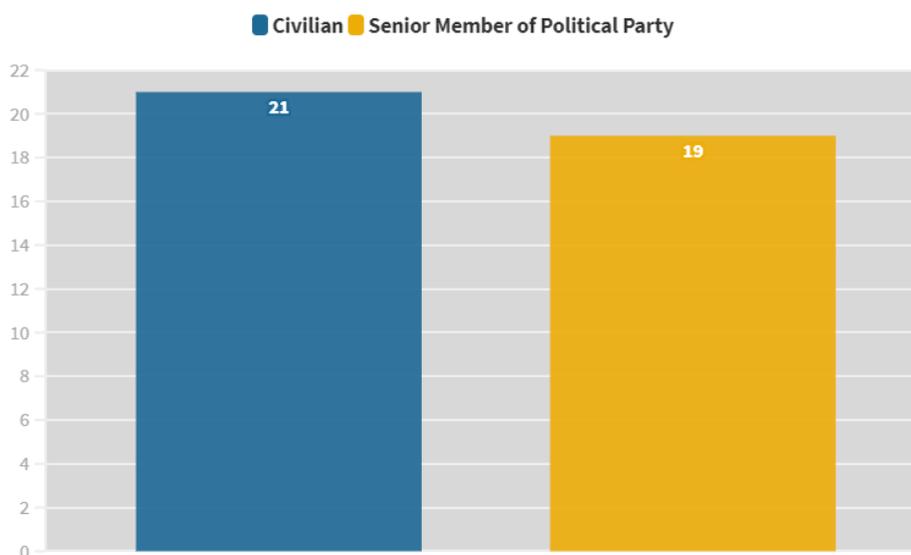
The majority of the individuals who placed content removal requests on the grounds of ‘absence of public interest’ were **lawyers** (23 items). All of these news articles were about ‘misconduct.’

Distribution of Contents Requested to be Removed Based on Absence of Public Interest by Vocational Positions of Complainants



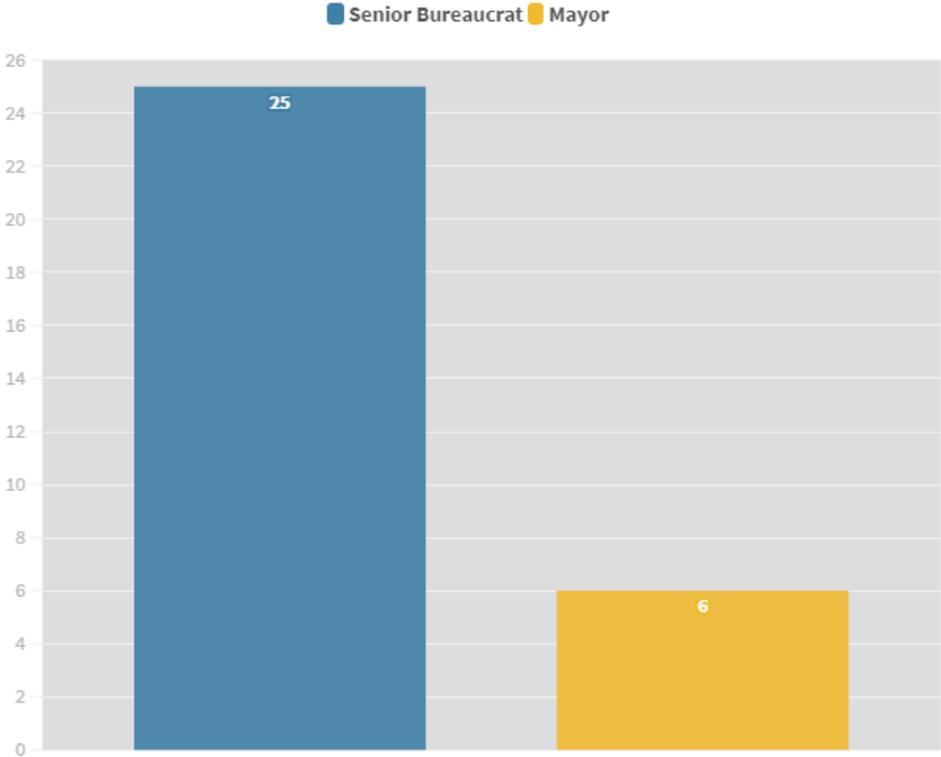
The majority of content removal requests on the grounds of ‘privacy’ were placed by **civilians** (21 items). 20 out of these 21 news items were about ‘assault and bodily harm’.

Distribution of Contents Requested to be Removed Based on Privacy by Vocational Positions of Complainants

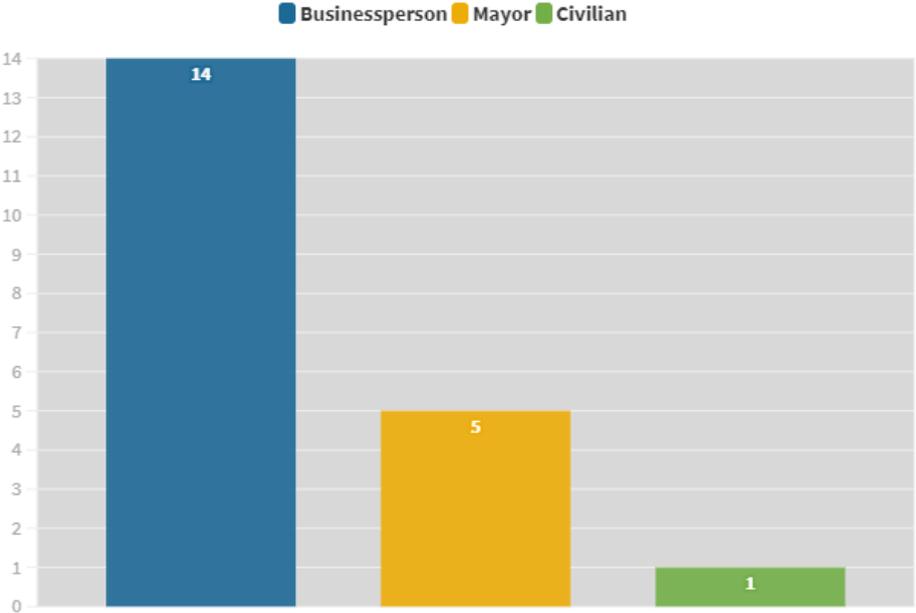


The majority of the content removal requests based on ‘violation of presumption of innocence’ came from **senior bureaucrats** (25 items). All of the news articles which were targeted for ‘violating the right against self-incrimination’ and which were taken to court by **business people** (14 items) were about ‘*corruption and irregularities.*’

Distribution of Contents Requested to be Removed Based on Violation of Presumption of Innocence by Vocational Positions of Complainants

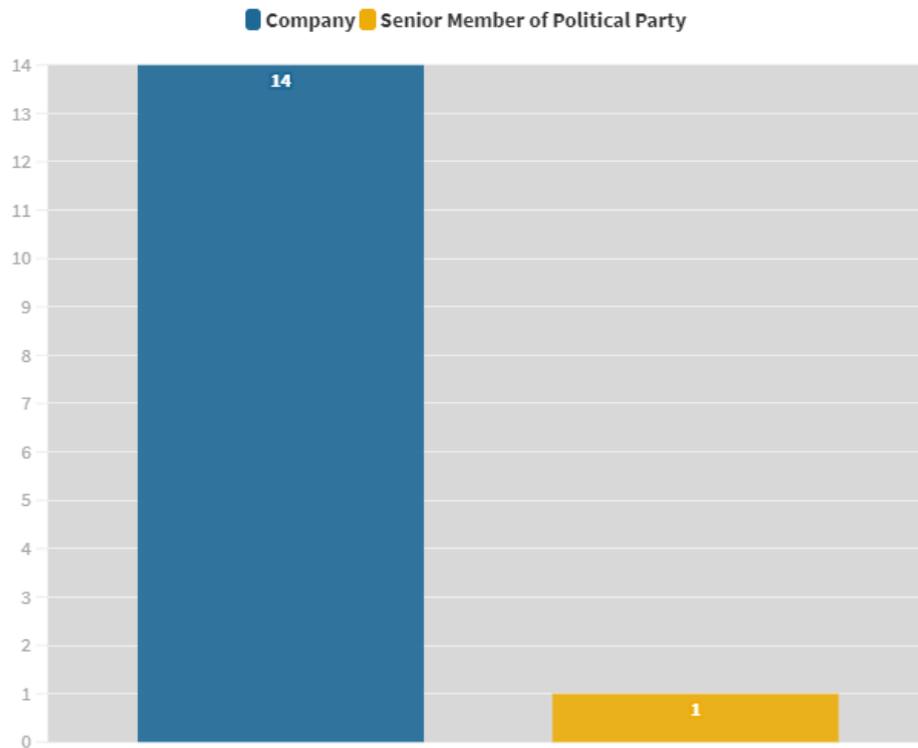


Distribution of Contents Requested to be Removed Based on The Right Against Self-Incrimination by Vocational Positions of Complainants



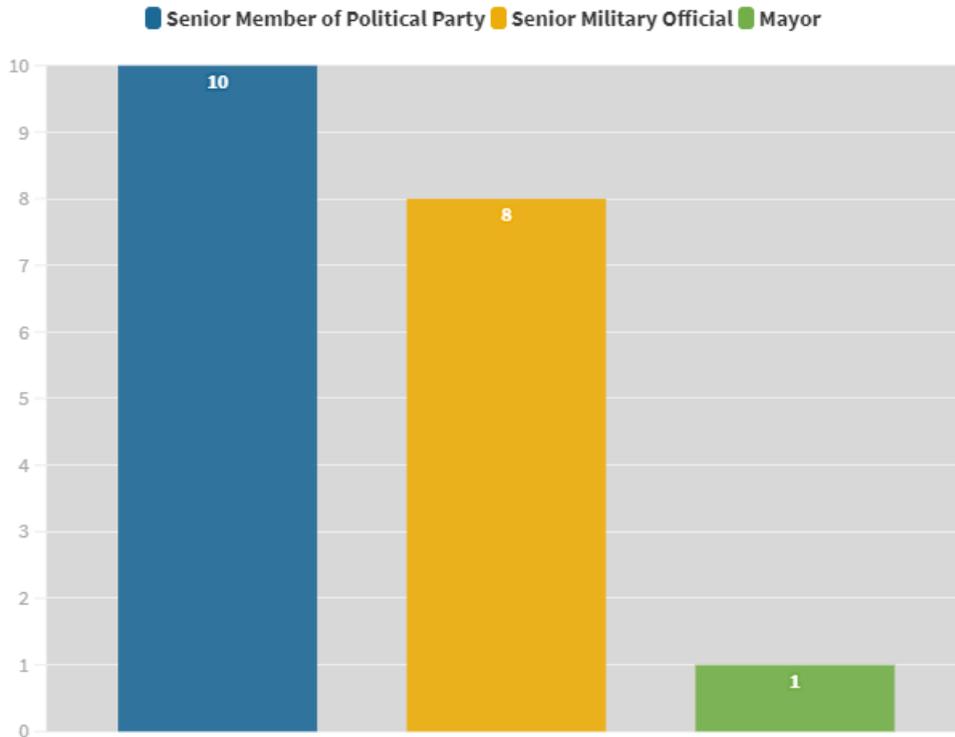
The complainants in content removal requests that were based on ‘damage to business reputation’ were primarily **companies** (14 items). The main theme in these news pieces was ‘*corruption and irregularities*’ (10 items). The position of the actors who placed takedown requests due to ‘copyright violation’ and ‘violation of child safety policy’ was unknown.

Distribution of Contents Requested to be Removed Based on Damage to Business Reputation by Vocational Positions of Complainants



Some of the justifications listed above were concurrently used in numerous content removal requests. For example, 19 requests were based on both ‘violation of personal rights’ and ‘the right to be forgotten.’ In this context, the requests which were based on two different justifications primarily came from **senior members of political parties** (10 items) and **senior military officials** (8 items). These news articles essentially reported on actions involving ‘*misconduct*’ (15 items) and ‘*corruption and irregularities*’ (4 items).

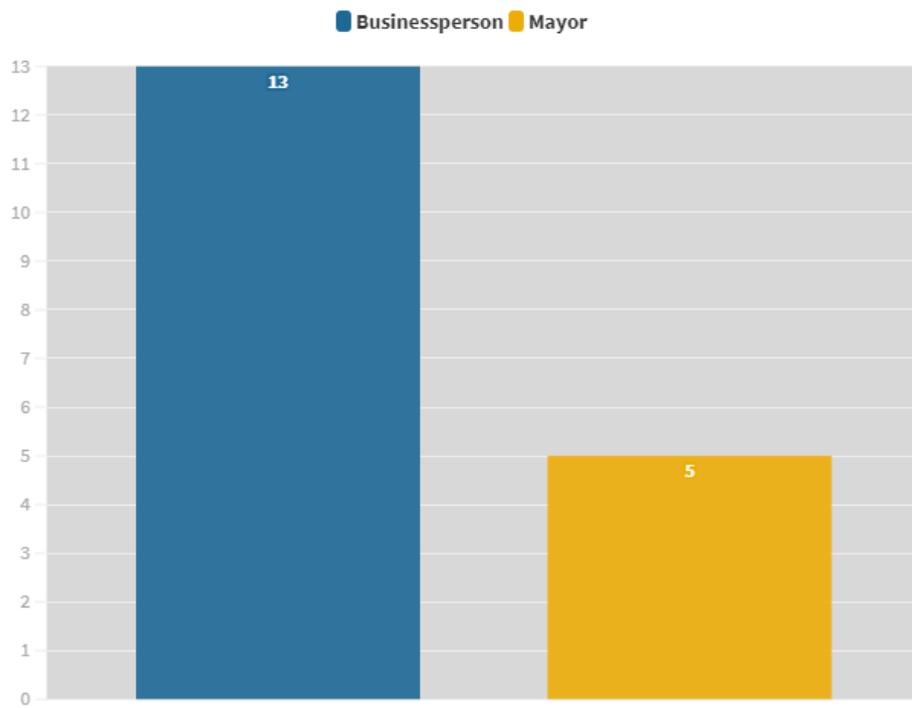
Distribution of Contents Requested to be Removed Based on Violation of Personal Rights and The Right to Be Forgotten by Vocational Positions of Complainants



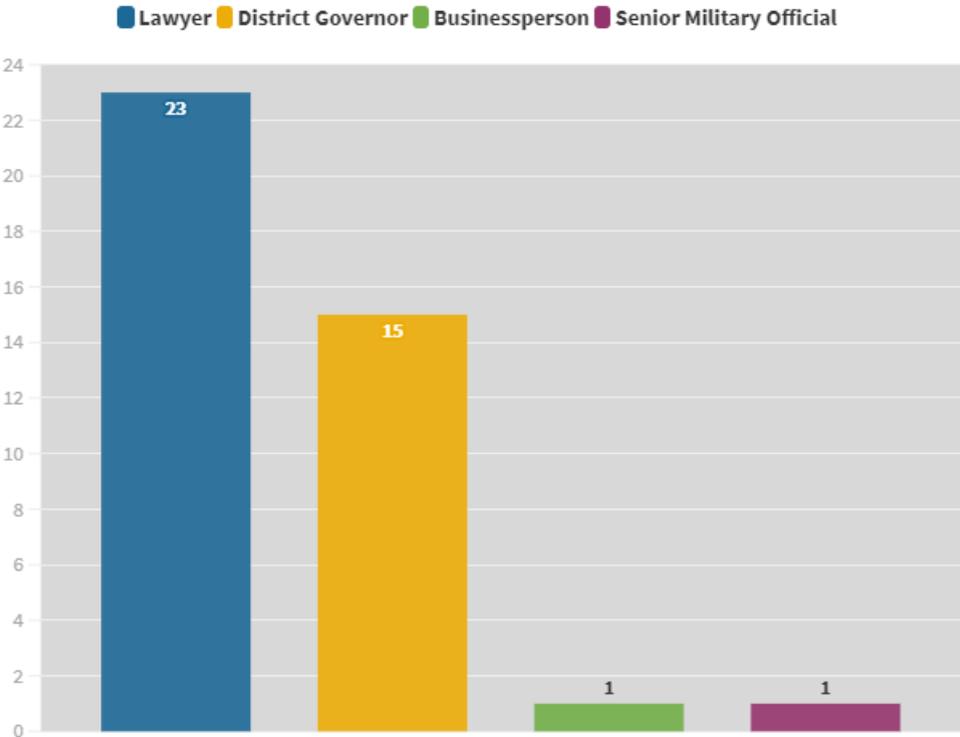
For example, 6 requests were based on ‘*violation of personal rights*’ and ‘*violation of presumption of innocence*’. In all of these requests, the complainants were mayors and the theme of the news articles was ‘*misconduct*.’ In addition, ‘*violation of personal rights*’ and ‘*privacy*’ were cited concurrently in 19 content removal requests. In all of these requests, the complainants were **senior members of political parties**, and the theme of the news articles was ‘*misconduct*.’

18 requests were based on ‘*violation of personal rights*’ and the ‘*right against self-incrimination*.’ The complainants in 13 of these requests were **business people**. Out of 18 articles, 13 reported on ‘*corruption and irregularities*’ and 5 were about ‘*misconduct*.’ ‘*Violation of personal rights*’ and ‘*absence of public interest*’ were concurrently used as a basis in 40 content removal requests. The majority of complainants were **lawyers** (23 items), followed by **district governors** (15 items). All of these news articles covered allegations of ‘*misconduct*.’

Distribution of Contents Requested to be Removed Based on Violation of Personal Rights and The Right Against Self-Incrimination by Vocational Positions of Complainants



Distribution of Contents Requested to be Removed Based on Violation of Personal Rights and Absence of Public Interest by Vocational Positions of Complainants



COMPLAINANTS

In the scope of the research, the complainants who filed takedown requests were anonymously classified by their titles due to concerns of privacy. The complainants were first classified as private and legal persons. In line with the categorization, the complainants were then classified by their professional positions in public or private sector and their roles in the public space. As a result of this classification, 26 categories were created. The online content which was cited in a removal request by an unknown complainant was classified as ‘unknown.’

Public Officials	Ministers, Mayors, Members of the Parliament, Judges, Public Prosecutors, Deputy Prosecutors, Deputy Governors, District Governors, School Principals, Chief
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	Physicians, Senior Military Officials, Other Senior Bureaucrats*
Legal Persons	Companies, Universities
Private Entities	Senior Members of Political Parties, Bank Executives, Business People, Lawyers, Academics, Athletes, Artists, Defendants, Civilians

Other Senior Bureaucrats: Advisors of the President, Advisors of Ministers, Undersecretaries, Ambassadors

Grand total

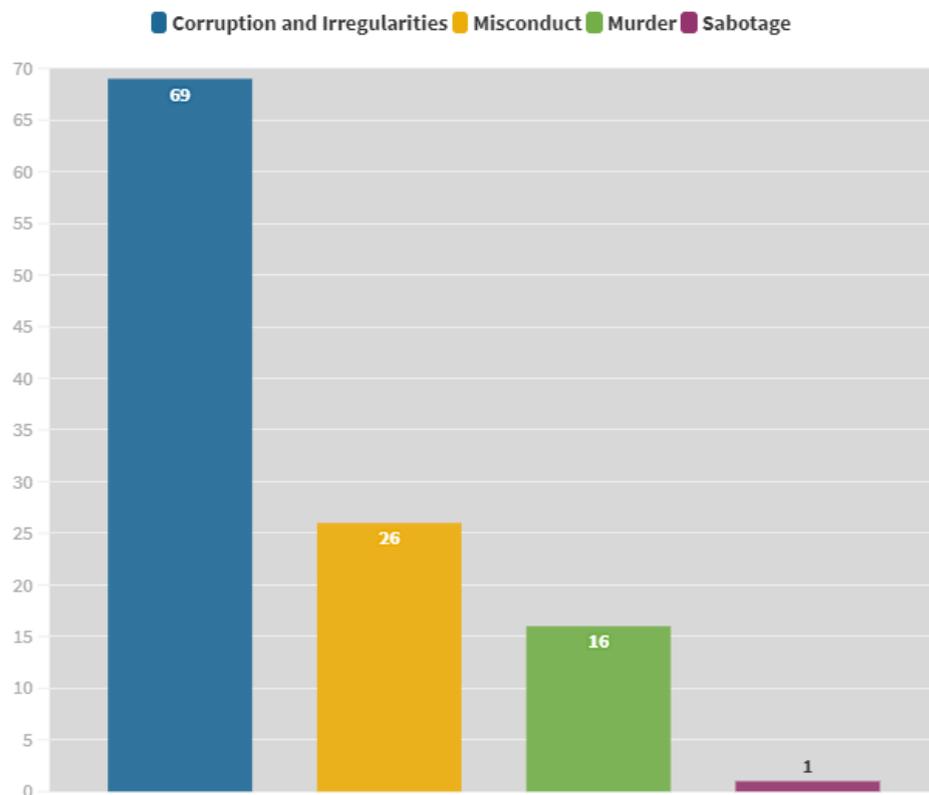
According to the research findings, the highest number of content removal requests were placed by **business people** (103 items). This group was followed by **ministers** (85 items), **lawyers** (70 items), **senior bureaucrats** (66 items), **civilians** (40 items), **senior members of political parties** (37 items), and **academics** (36 items), respectively. The other complainants include: **Companies** (25 items), **mayors** (19 items), **public prosecutors** (16 items), **district governors** (15 items), **judges** (15 items), **members of the parliament** (12 items), **bank executives** (12 items), **senior military officials** (10 items), **artists** (9 items), **defendants** (8 items), **deputy governors** (7 items), **athletes** (4 items), **former mayors** (3 items), **civil servants** (3 items), **universities** (2 items), **deputy prosecutors** (1 item), **school principals** (1 item), **chief physicians** (1 item). In content removal requests placed for 58 news items, the positions of the complainants were unknown.

Vocational Positions of Complainants



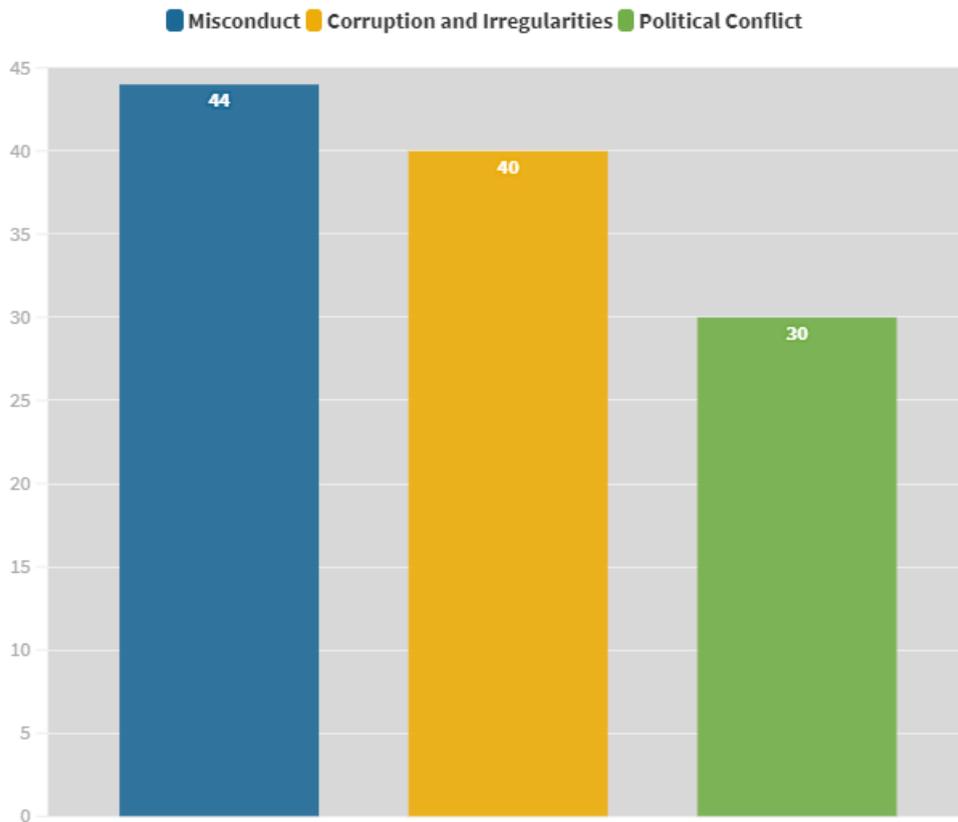
Business people (103 items) primarily applied for removal of news pieces on ‘*corruption and irregularities*’ (69 items), ‘*misconduct*’ (26 items) and ‘*murder*’ (16 items). Out of these 103 news items, 9 covered allegations of both ‘*corruption and irregularities*’ and ‘*misconduct*.’

Distribution of News Topics Requested to be Taken Down by Business People



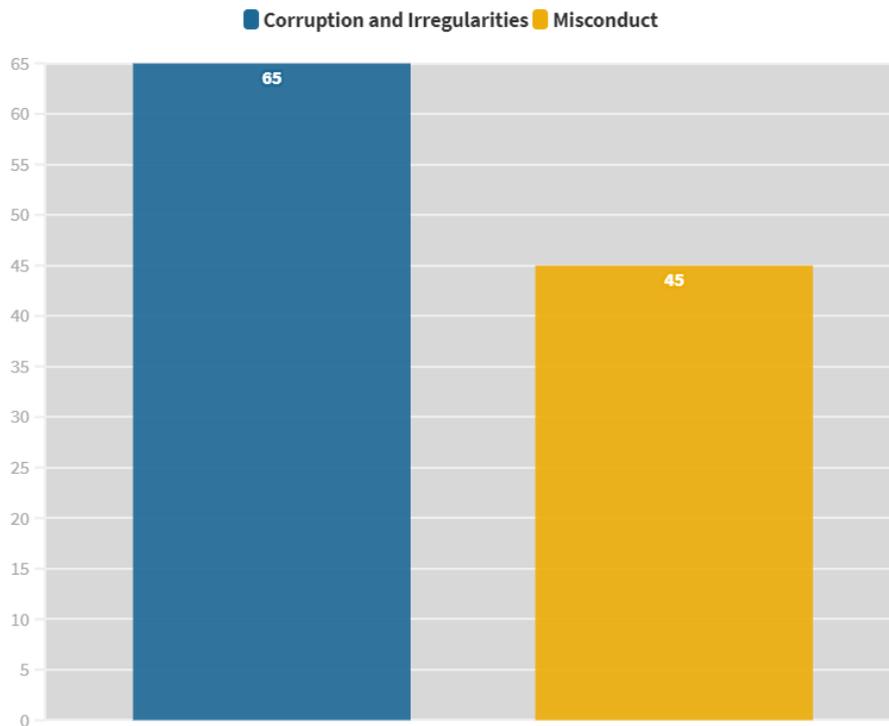
The plaintiffs who held a position as a **minister** (85 items) primarily requested removal of content on ‘*misconduct*’ (44 items), ‘*corruption and irregularities*’ (40 items) and ‘*political conflict*’ (30 items). A total of 29 news reports were about actions involving both ‘*corruption and irregularities*’ and ‘*misconduct*.’

Distribution of News Topics Requested to be Taken Down by Ministers



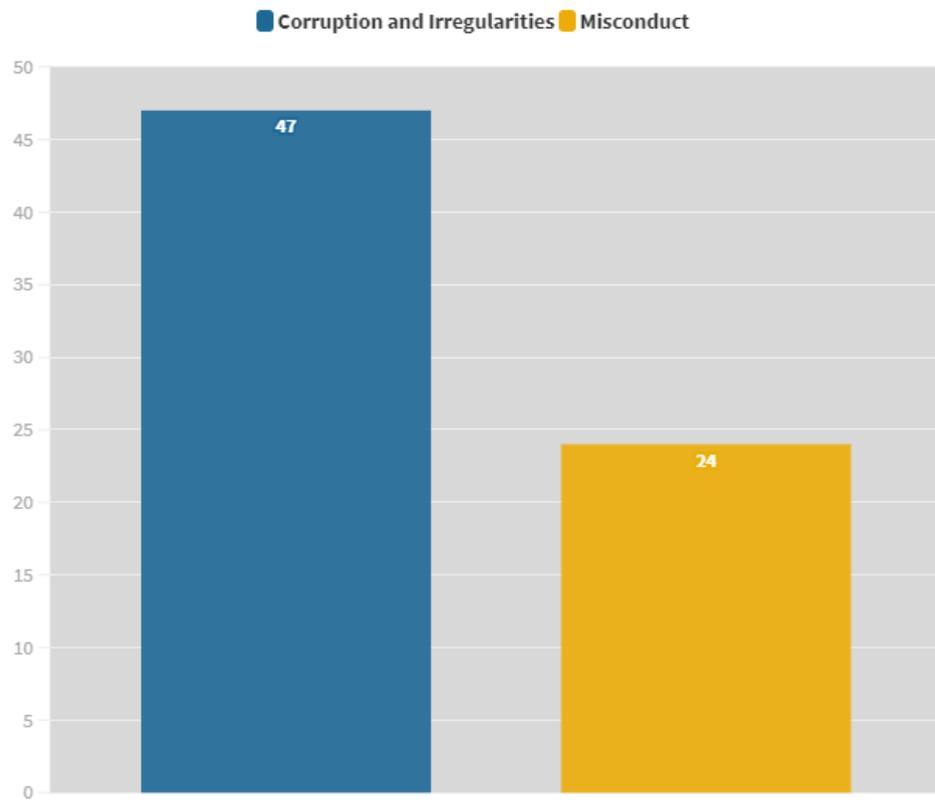
Senior bureaucrats (66 items) applied to the courts for removal of 65 news articles on '*corruption and irregularities*' and 45 news pieces on '*misconduct*'. 44 of these news articles covered actions involving both offenses.

Distribution of News Topics Requested to be Taken Down by Senior Bureaucrats

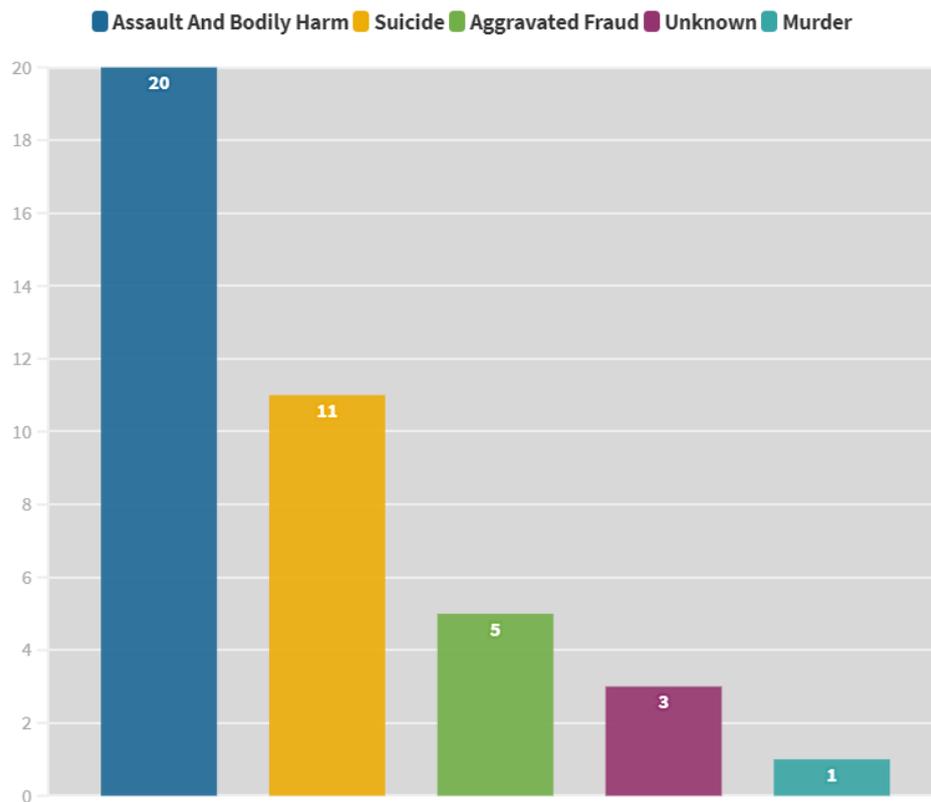


Lawyers requested the removal of 70 news items, including 47 articles about ‘*corruption and irregularities*’ and 24 articles on ‘*misconduct*’. One of these news articles describe allegations of both offenses. **Civilians** (40 items) primarily targeted news reports about ‘*assault and bodily harm*’ (20 items) and ‘*suicide*’ (11 items).

Distribution of News Topics Requested to be Taken Down by Lawyers

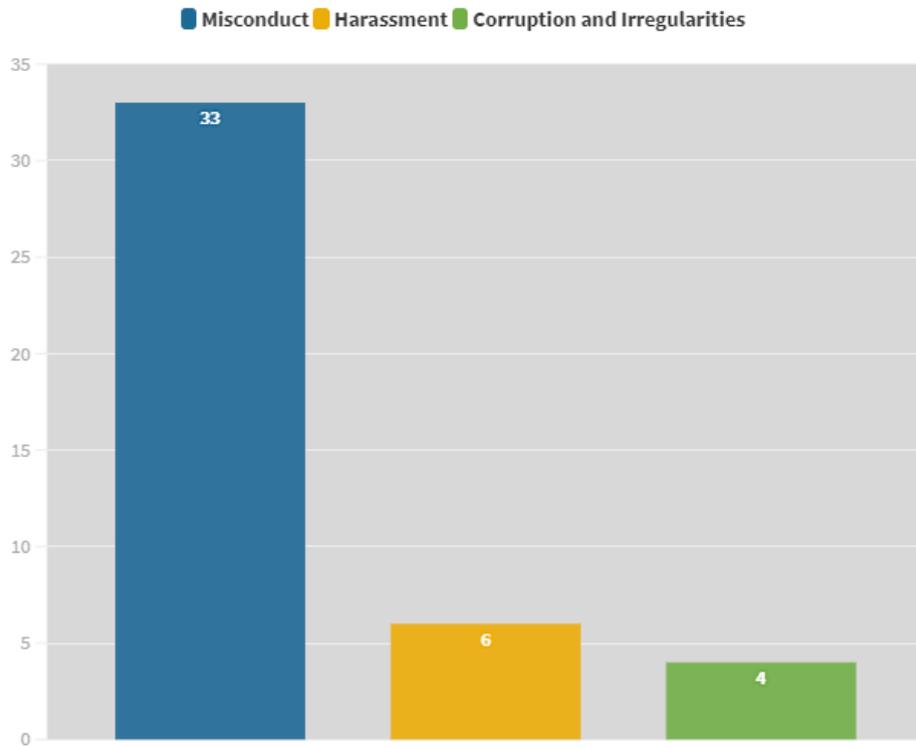


Distribution of News Topics Requested to be Taken Down by Civilians

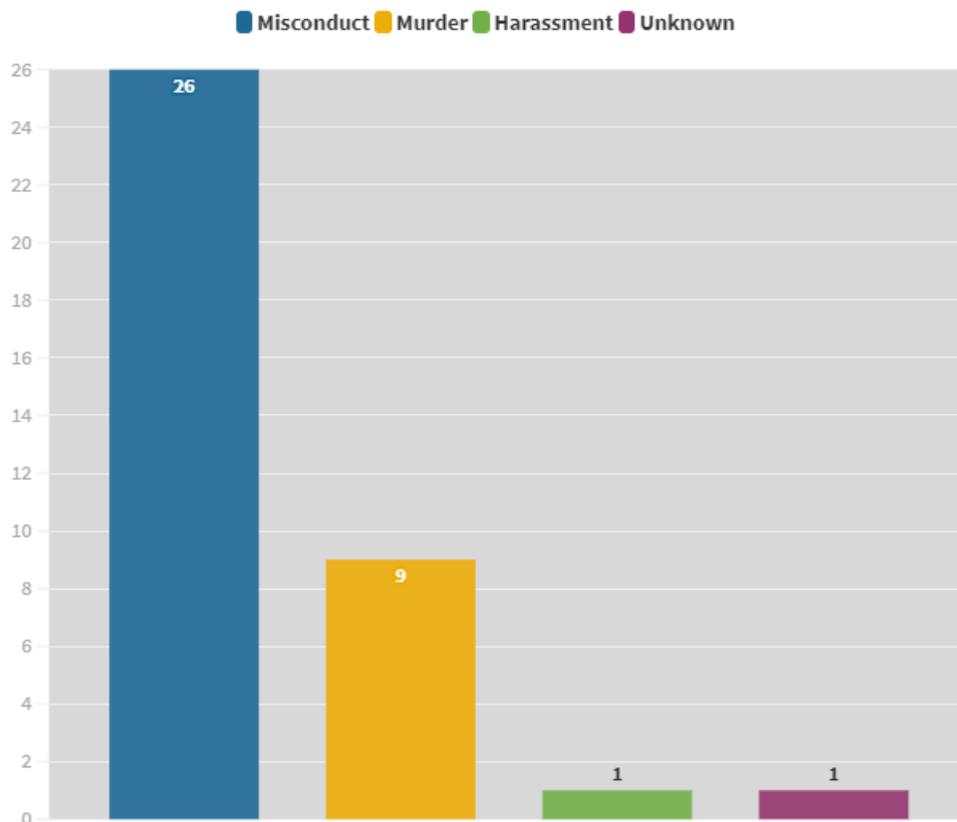


Senior members of political parties (37 items) mainly appealed against news pieces on ‘*misconduct*’ (33 items). A total of six news reports featured allegations of ‘*misconduct*’ and ‘*harassment*’. The news articles that covered allegations against **academics** (36 items) were primarily about ‘*misconduct*’ (26 items) and ‘*murder*’ (9 items). There was also one news article containing allegations of ‘*harassment*’ and ‘*misconduct*’.

Distribution of News Topics Requested to be Taken Down by Senior Members of Political Parties



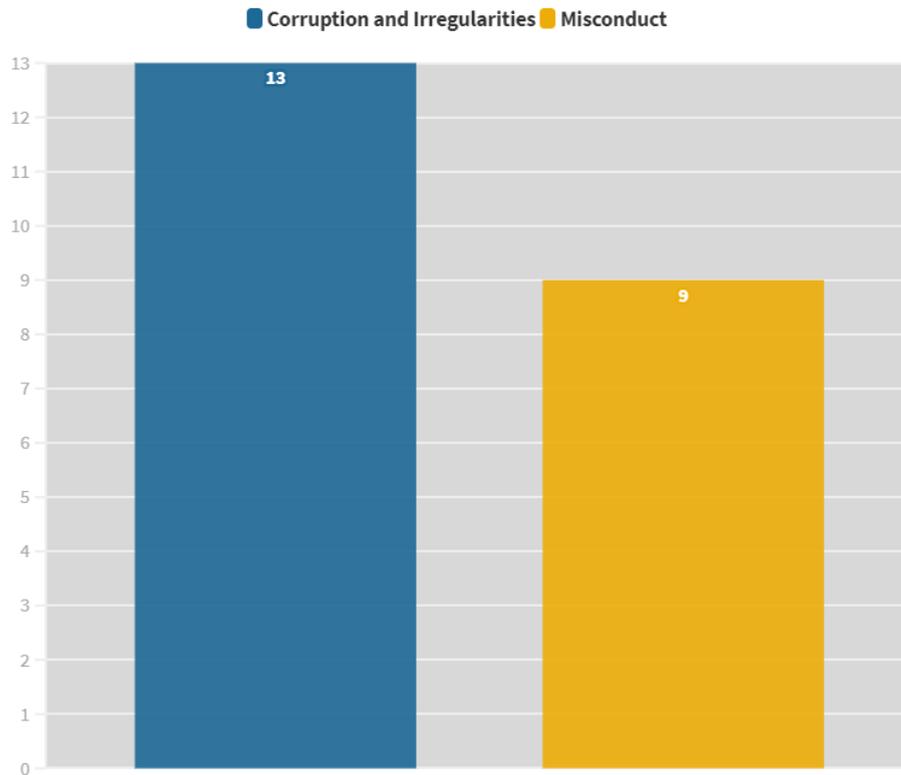
Distribution of News Topics Requested to be Taken Down by Academicians



Companies (25 items) often filed applications to remove news articles on ‘*corruption and irregularities*’ (21 items) and ‘*environmental damage*’ (4 items). **Mayors** (19 items) also targeted news articles on allegations of ‘*misconduct*’ (17 items) and ‘*corruption and irregularities*’ (13 items). A total of 11 news items were about actions involving both ‘*corruption and irregularities*’ and ‘*misconduct*.’

The news reports which were taken to court by **prosecutors** (16 items) mainly reported on ‘*corruption and irregularities*’ (13 items) and ‘*misconduct*’ (9 items). 6 of these reports mentioned both offenses.

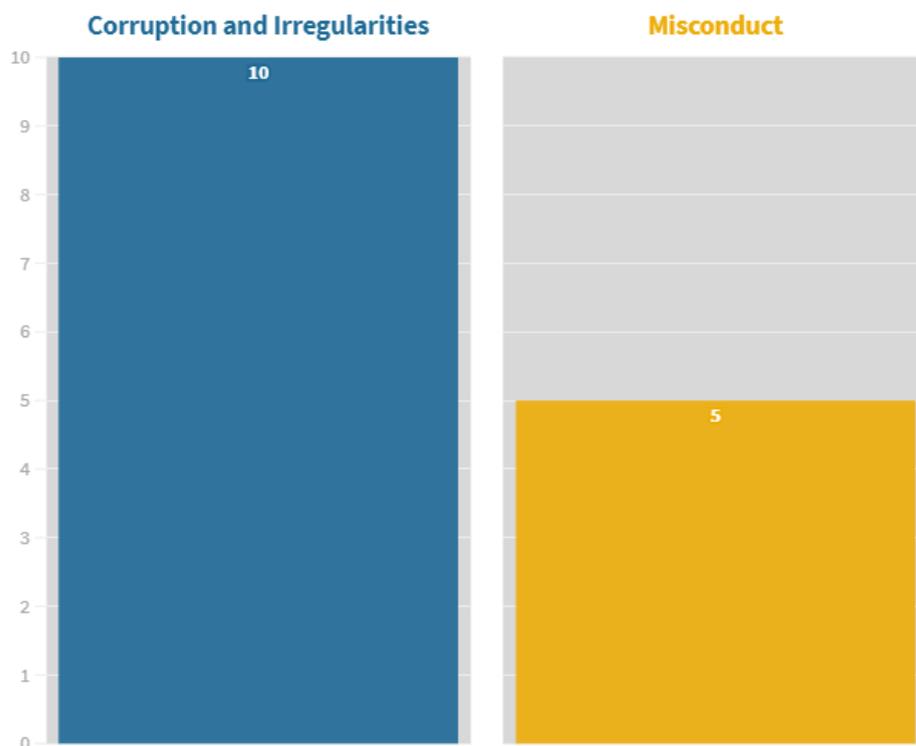
Distribution of News Topics Requested to be Taken Down by Public Prosecutors



District governors (15 items) exclusively filed complaints against news articles on ‘*misconduct.*’ All of the news articles targeted by **judges** (15 items) covered reports of ‘*misconduct.*’ Besides, there were three news items which reported on both ‘*corruption and irregularities*’ and ‘*misconduct.*’

Members of the parliament (12 items) primarily applied to remove news pieces on ‘*corruption and irregularities*’ (10 items) and ‘*misconduct*’ (5 items). Three of these news reports covered both of these themes. **Bank executives** (12 items) mainly filed content removal requests against news reports on ‘*corruption and irregularities.*’

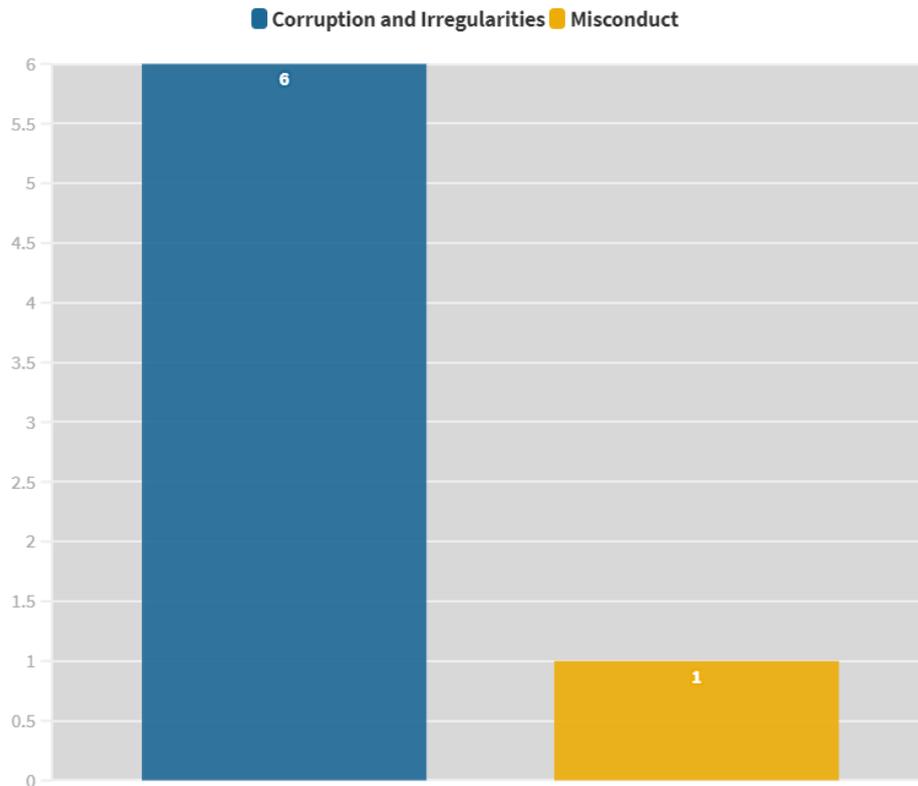
Distribution of News Topics Requested to be Taken Down by Members of Parliament



All of the news articles appealed by **senior military officials** (10 items) reported allegations of ‘*misconduct*’. All of the news reports cited in content removal requests by **artists** (9 items) were reports of gambling, which is considered as a misdemeanor.

Similarly, all of the news articles targeted by **defendants** of various court cases (8 items) were reports of ‘*murder*’. **Deputy mayors** (7 items) placed content removal requests against news articles on ‘*misconduct*’ (6 items) and ‘*corruption and irregularities*’ (1 item).

Distribution of News Topics Requested to be Taken Down by Deputy Governors



Furthermore, all of the news articles featuring **athletes** (4 items) reported two concurrent offenses, which were ‘*corruption and irregularities*’ and ‘*misconduct*’. **Former mayors** (3 items) mainly filed content removal requests against news reports on ‘*corruption and irregularities*.’

All of the news articles that were appealed by **civil servants** (3 items) covered reports of ‘*misconduct*.’ **Universities** (2 items), which are legal entities, filed content removal requests against news articles on ‘*misconduct*’ and ‘*corruption and irregularities*’.

Content removal requests placed by **deputy prosecutors** (1 item), **school principals** (1 item) and **chief physicians** (1 item) were reports of ‘*misconduct*’.

RECIPIENTS OF CONTENT REMOVAL REQUESTS

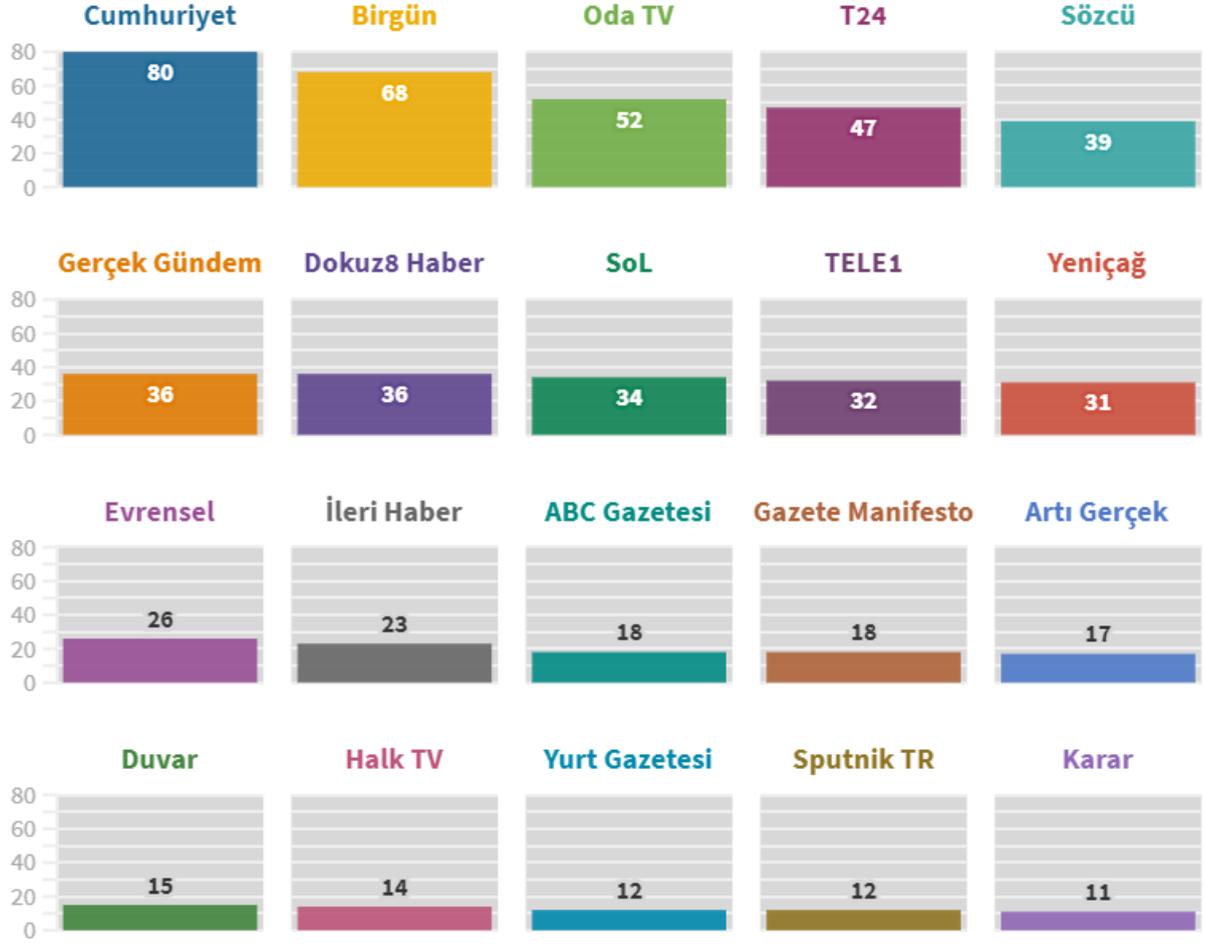
In the scope of this research, a total of 35 news outlets were monitored. These organizations can be listed as follows in alphabetical order: ABC Gazetesi, Artı Gerçek, BBC Turkish, Bianet, Birgün, Cumhuriyet, dokuz8HABER, Duvar, DW Turkish, Evrensel, Fox TV, Gazete

Fersude, Gazete Kolektif, Gazete Manifesto, Gazete Yolculuk, Gerçek Gündem, Halk TV, İleri Haber, Karar, Medyascope, ODA TV, P24, Sendika.org, SoL, Sözcü, Sputnik Türkçe, T24, TELE1, Tükenmez Haber, Umut Gazetesi, Yeni Yaşam, Yeni1Mecra, Yeniçağ, Yurt Gazetesi, 140Journos.

Cumhuriyet, the official website of left-wing daily Cumhuriyet, received by far the highest number of content removal orders (80 items) during the time period covered by this research. It was followed by BirGün daily (68 items), ODA TV (52 items), T24 (47 items), Sözcü (39 items), dokuz8HABER (36 items), Gerçek Gündem (36 items), SoL (34 items), TELE1 (32 items), and Yeniçağ (31 items). The following news organizations received 10 to 30 content removal orders during the same period: Evrensel daily (26 items), İleri Haber (23 items), ABC newspaper (18 items), Gazete Manifesto (18 items), Artı Gerçek (17 items), Duvar (15 items), Halk TV (14 items), Yurt Gazetesi (12 items), Sputnik Turkey (12 items), Karar (11 items).

Among the news outlets which received less than 10 content removal orders, Gazete Yolculuk was in the first place (6 items). It was followed by Tükenmez Haber (5 items), Gazete Kolektif (5 items), Bianet (3 items), Sendika.org (3 items), Umut Gazetesi (2 items) DW Turkish (2 items), Yeni Yaşam (2 items), Gazete Fersude (2 items), P24 (2 items), BBC Turkish (1 item), Yeni1Mecra (1 item), 140Journos (1 item), Fox TV (1 item), and Medyascope (1 item).

Distribution of Recipients





Cumhuriyet

During the time period covered by this research, Cumhuriyet daily received content removal requests for 80 news pieces. In this context, the organization became the top recipient of content removal requests in the scope of this research. Cumhuriyet was also the top recipient of content removal requests placed by **ministers** (9 items), **members of the parliament** (5 items), **defendants** (4 items) and **senior bureaucrats** (10 items).

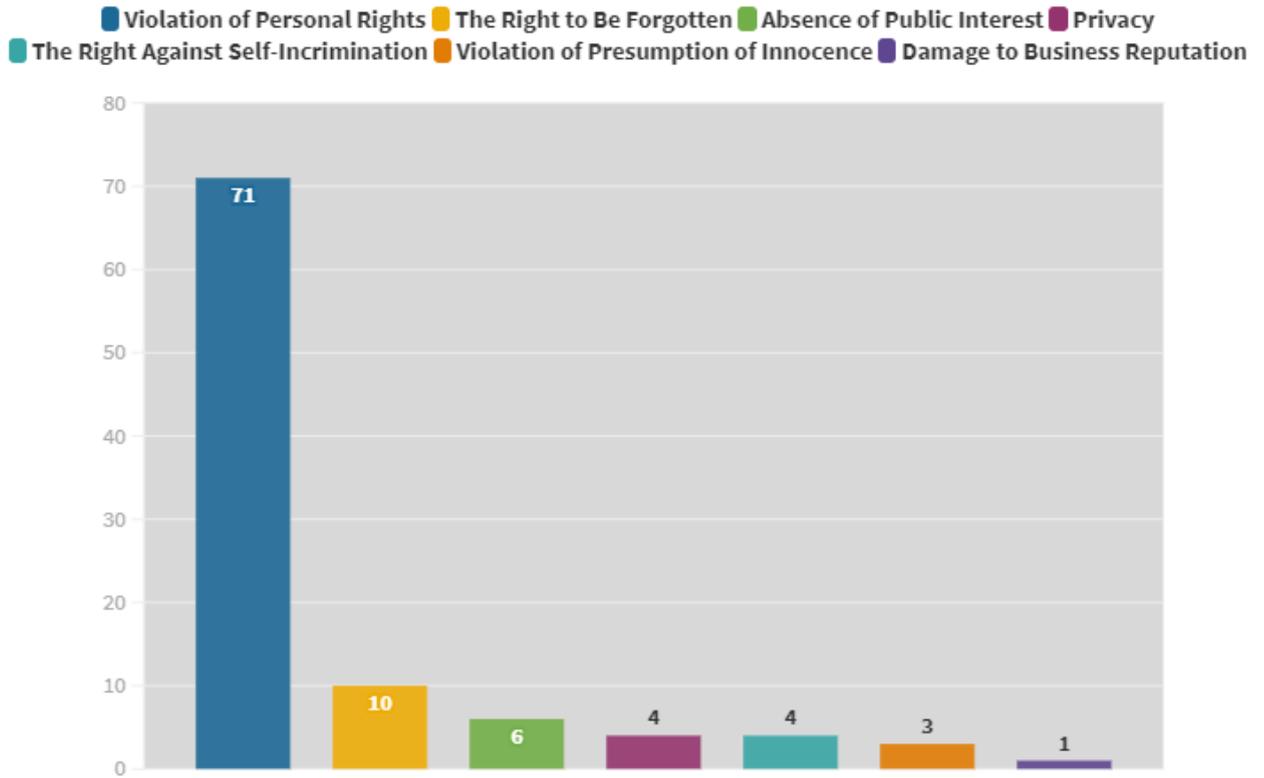
The primary theme of these news reports was ‘*corruption and irregularities*’ (40 items), followed by ‘*misconduct*’ (32 items), ‘*murder*’ (7 items), and ‘*political conflict*’ (6 items). ‘*Corruption and irregularities*’ and ‘*misconduct*’ were cited concurrently in ten news reports. In this cluster, the majority of the requests came from **senior bureaucrats** (4 items). In addition to that one news covered both ‘*misconduct*’ and ‘*harassment*’.

Distribution of News Topics Requested to be Taken Down



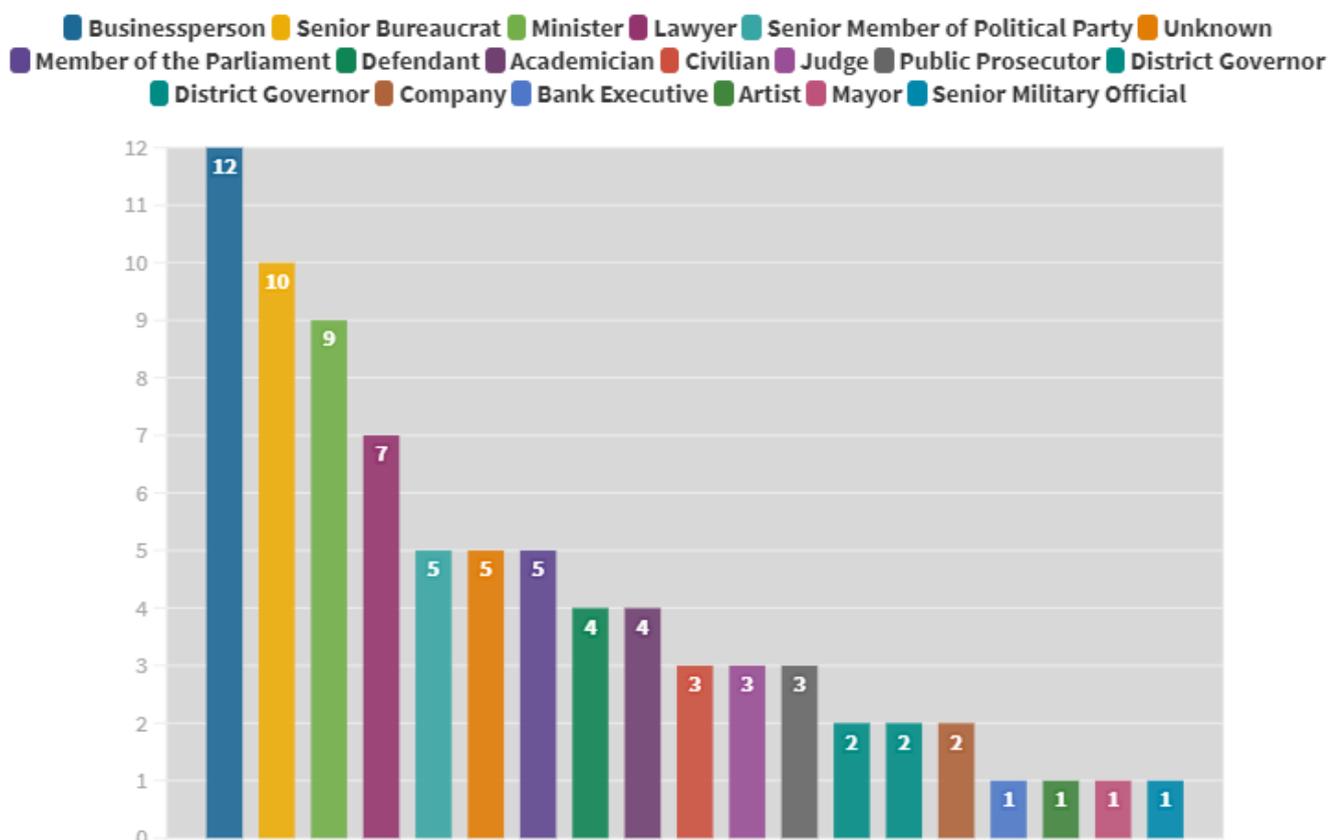
The outstanding majority of the content removal requests against Cumhuriyet were based on ‘violation of personal rights’ (71 items). Other cited justifications include the ‘right to be forgotten’ (10 items) and ‘absence of public interest’ (6 items). Furthermore, several content removal requests were based on multiple justifications: e.g., ‘violation of personal rights’ and ‘absence of public interest’ (6 items); ‘violation of personal rights’ and ‘right against self-incrimination’ (4 items); ‘violation of personal rights’ and ‘right to be forgotten’ (3 items); ‘violation of personal rights’ and ‘privacy’ (2 items); ‘violation of personal rights’, ‘violation of presumption of innocence’ and ‘right against self-incrimination’ (1 item). Two requests cited the ‘right to be forgotten’ and ‘violation of presumption of innocence’ and one request was based on ‘damage to business reputation’ and the ‘right to be forgotten’.

Justifications for Content Removal Requests



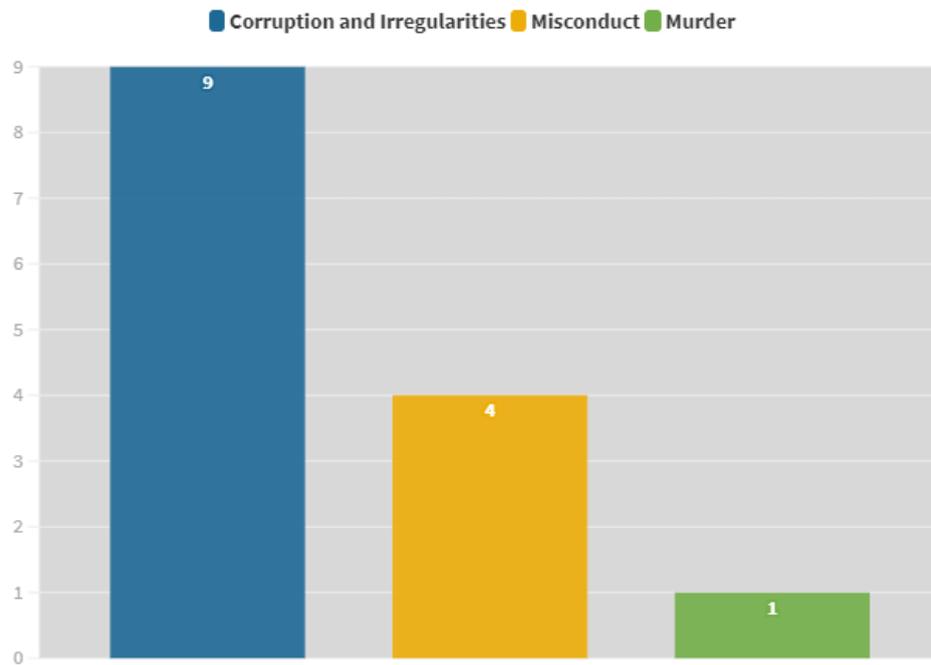
The majority of the requests submitted to Cumhuriyet were placed by **business people** (12 items), followed by **senior bureaucrats** (10 items) and **ministers** (9 items).

Vocational Positions of Complainants



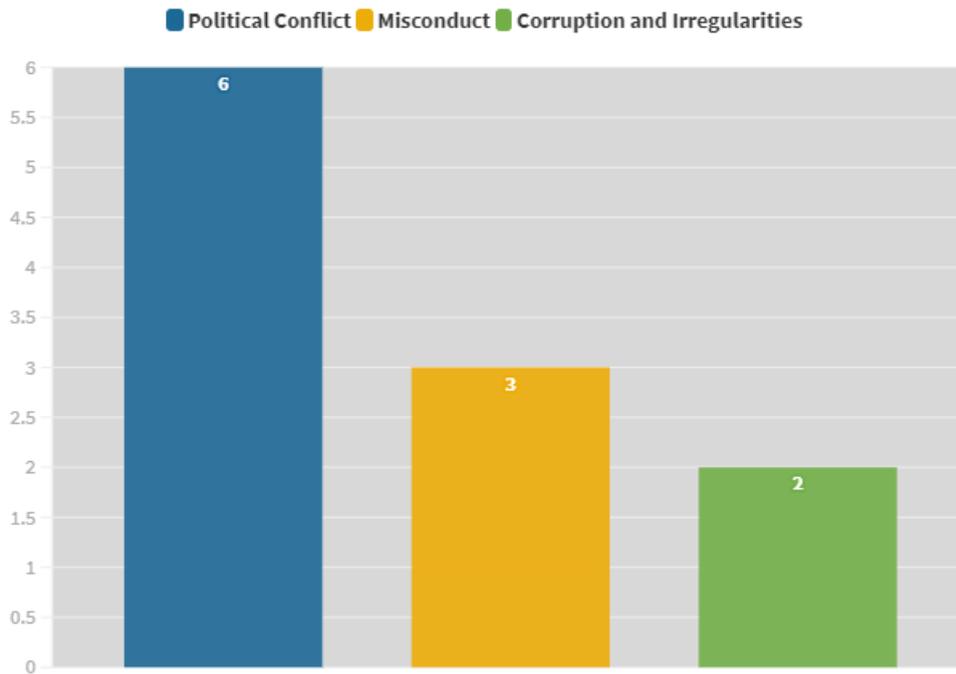
The news articles targeted by **business people** were primarily reports of ‘*corruption and irregularities*’ (9 items) and ‘*misconduct*’ (4 items). Two of these articles cited both allegations. All of the content removal requests against these news pieces were based on ‘*violation of personal rights*’, which was accompanied by ‘*the right against self-incrimination*’ in three requests.

Distribution of News Topics Requested to be Taken Down by Business People



Out of nine content removal requests placed by **ministers**, two were reports of both ‘*corruption and irregularities*’ and ‘*misconduct*’, and one article only reported allegations of ‘*misconduct*’. The other six news reports were about ‘*political conflict*’. All of the removal requests were based on ‘*violation of personal rights*’.

Distribution of Contents Requested to be Removed by Ministers



10 content removal requests were placed by **senior bureaucrats**. All of these reports contained allegations of '*corruption and irregularities*'. Furthermore, four articles covered reports of both '*corruption and irregularities*' and '*misconduct*.' Eight of the content removal requests placed by senior bureaucrats were based on '*violation of personal rights*' and two were based on the '*right to be forgotten*'.

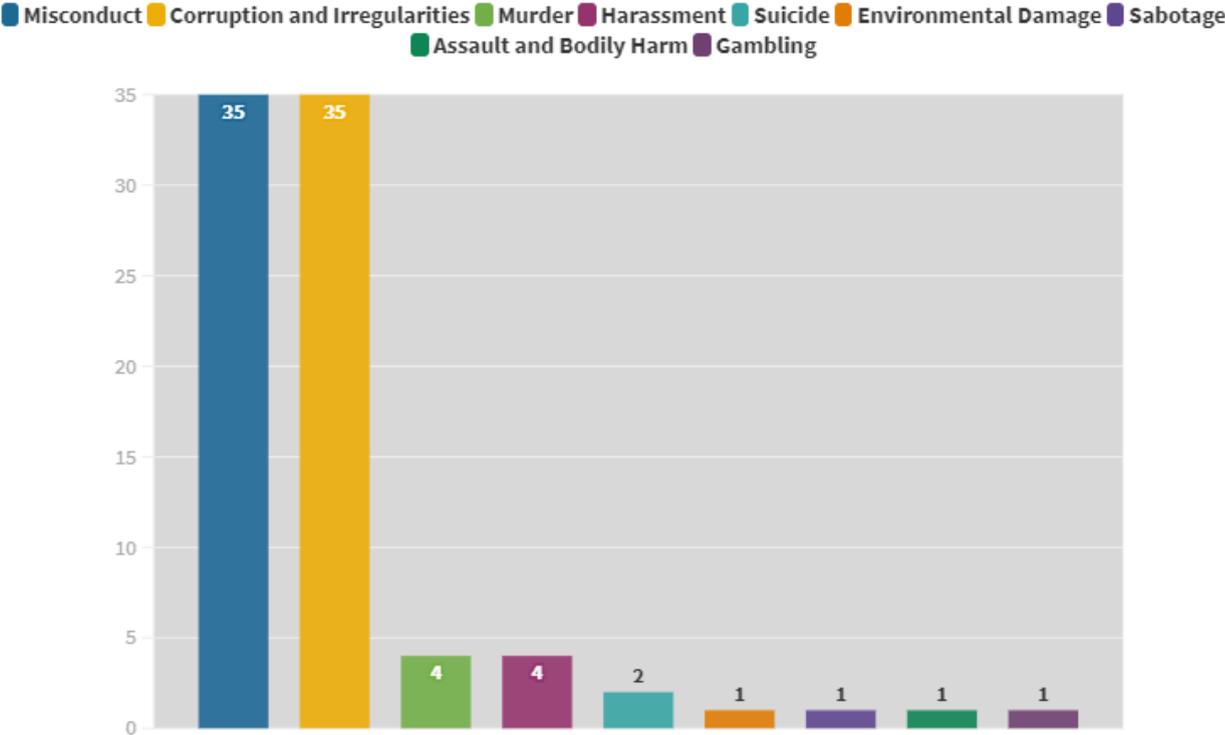
BirGün

According to our research, a total of 68 orders were placed to take down news reports published by the online portal of BirGün daily. Therefore, BirGün is in the second place in terms of the number of content removal requests received during the research period. BirGün was also the primary recipient of takedown orders placed by **academics** (6 items), **athletes** (4 items) and **senior military officials** (2 items).

The news reports published by this outlet mainly covered allegations of '*corruption and irregularities*' (35 items), '*misconduct*' (35 items) and '*murder*' (4 items). In addition, 12 news pieces covered both '*corruption and irregularities*' and '*misconduct*'. The majority of the complainants against these news reports were **athletes**. Besides, four of the news reports

covered allegations of both ‘*misconduct*’ and ‘*harassment*’. The majority of the complainants in this cluster were **civil servants** (2 items).

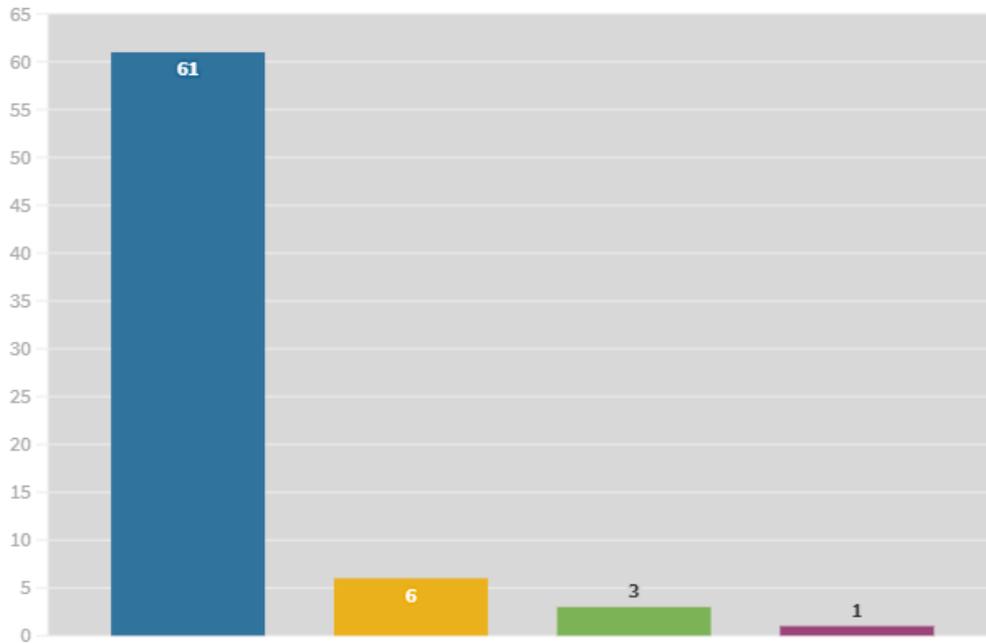
Distribution of News Topics Requested to be Taken Down



These requests often cited ‘*violation of personal rights*’ (61 items). It was followed by the ‘*right to be forgotten*’ (6 items). Besides, two content removal requests cited ‘*absence of public interest*’ and ‘*violation of personal rights*’. The complaints filed on the basis of violation of personal rights primarily came from **lawyers** (8 items) and **business people** (8 items), followed by **academics** (6 items) and **senior bureaucrats** (6 items).

Justifications for Content Removal Requests

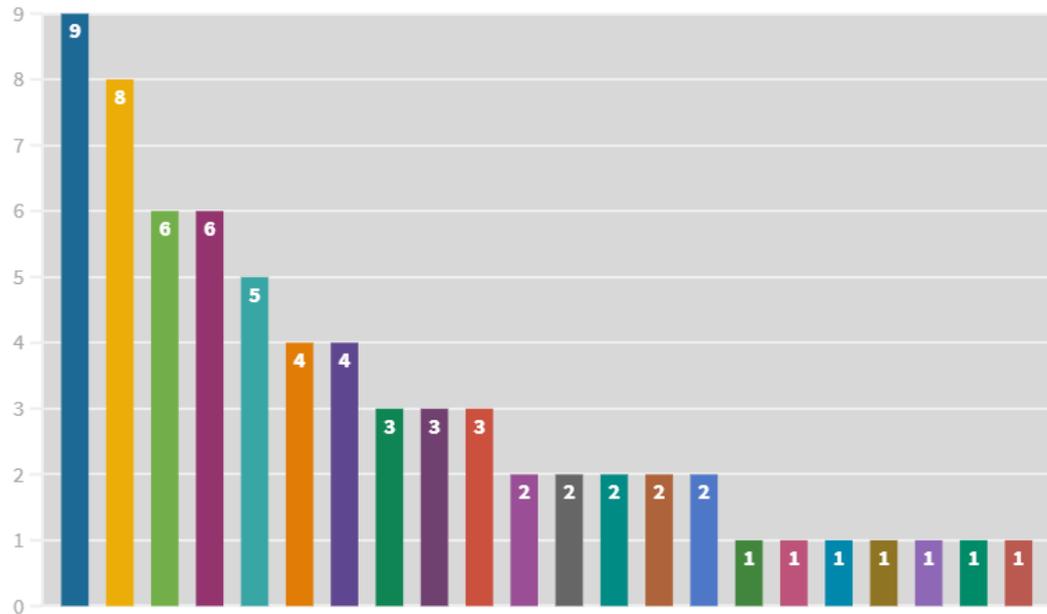
■ Violation of Personal Rights ■ The Right to Be Forgotten ■ Absence of Public Interest ■ Damage to Business Reputation



The majority of the complainants who placed content removal requests against BirGün were **business people** (9 items), followed by **lawyers** (8 items), **academics** (6 items) and **senior bureaucrats** (6 items).

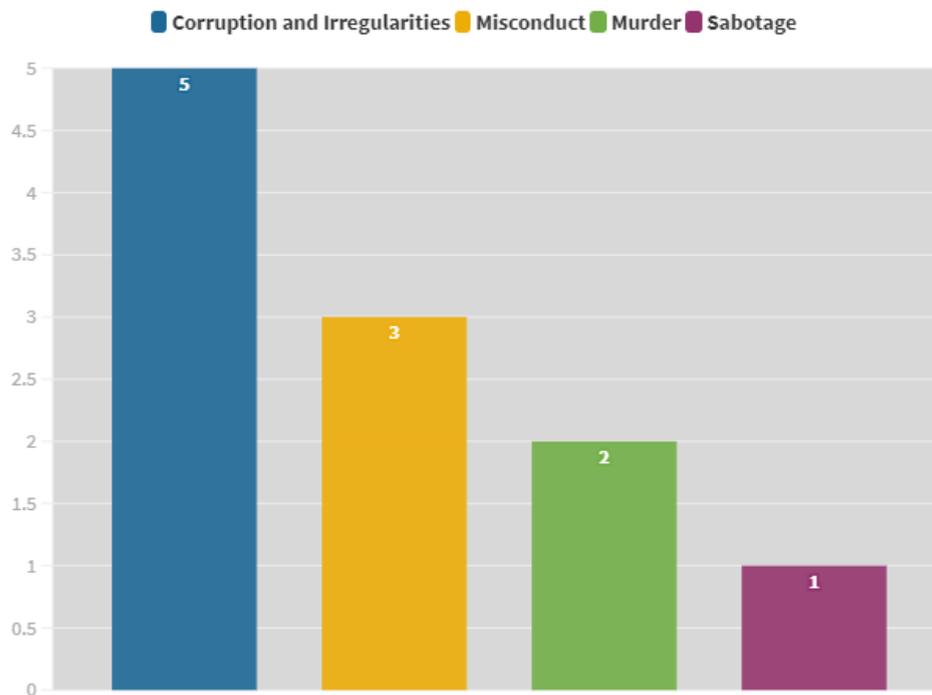
Vocational Positions of Complainants

■ Businessperson ■ Lawyer ■ Senior Bureaucrat ■ Academician ■ Company ■ Unknown ■ Athlete
■ Public Prosecutor ■ Civilian ■ Minister ■ Mayor ■ Civil Servant ■ Senior Member of Political Party
■ Senior Military Official ■ University ■ District Governor ■ Bureaucrat ■ Deputy Governor ■ Bank Executive
■ Artist ■ Defendant ■ Member of the Parliament



Out of nine content removal orders placed by business people, five were filed against news reports citing ‘*corruption and irregularities*’. On the other side, two news reports were about actions involving both ‘*corruption and irregularities*’ and ‘*misconduct*.’ It must be noted that all of the content removal requests filed by this group were based on ‘*violation of personal rights*’.

Distribution of News Topics Requested to be Taken Down by Business People



Lawyers (8 items) were the second biggest group to file for content removal orders against BirGün, and out of these items, seven were reports of ‘*corruption and irregularities*’ and one reported allegations of ‘*misconduct*’. ‘*Violation of personal rights*’ was the most cited justification in these orders. **Senior bureaucrats** (6 items), the third group, exclusively targeted news reports on ‘*corruption and irregularities*’, which was cited concurrently with allegations of ‘*misconduct*’ in three news items. The most common justification mentioned these requests was the ‘*violation of personal rights*’ (5 items).

ODA TV

With 52 takedown orders, ODA TV received the third highest number of content removal requests. The online news portal also became the main target of takedown orders placed by **mayors** (12 items) and **civilians** (5 items).

Most of the news items cited in these orders were reports of ‘*corruption and irregularities*’ (32 items), ‘*misconduct*’ (28 items) and ‘*political conflict*’ (3 items). It should also be noted that out of 52 items, 19 reported allegations of both ‘*corruption and irregularities*’ and ‘*misconduct*’. The complainants against these reports were: **Mayors** (11 items), **prosecutors**

(2 items), **business people** (2 items), **senior bureaucrats** (1 item), **ministers** (1 item), and **members of the parliament** (1 item)

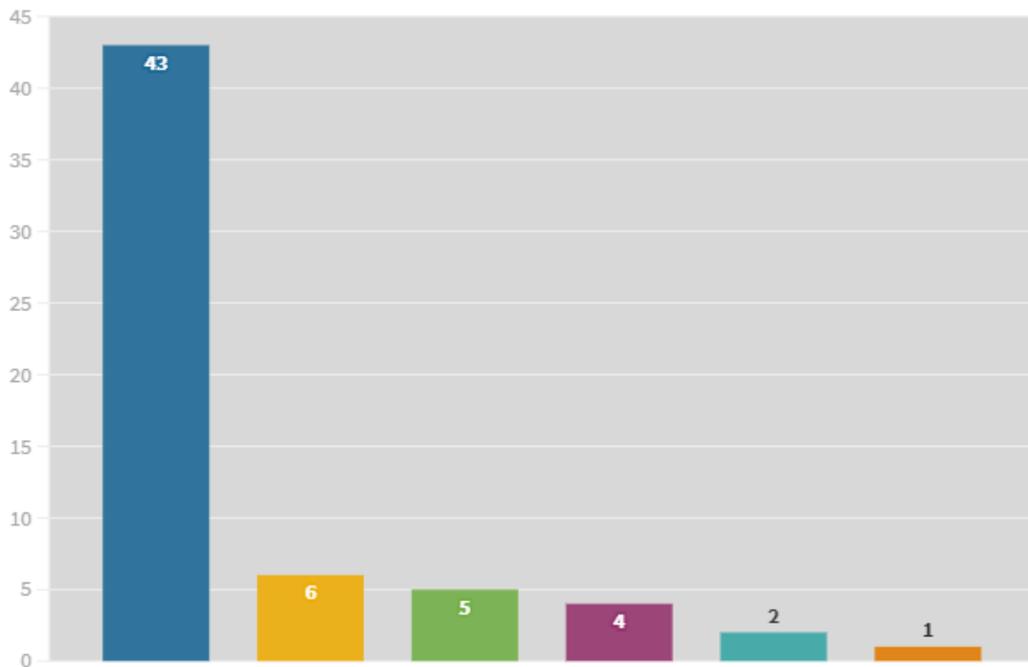
Distribution of News Topics Requested to be Taken Down



The majority of the takedown orders were based on ‘*violation of personal rights*’ (43 items), followed by ‘*damage to business reputation*’ (6 items).

Justifications for Content Removal Requests

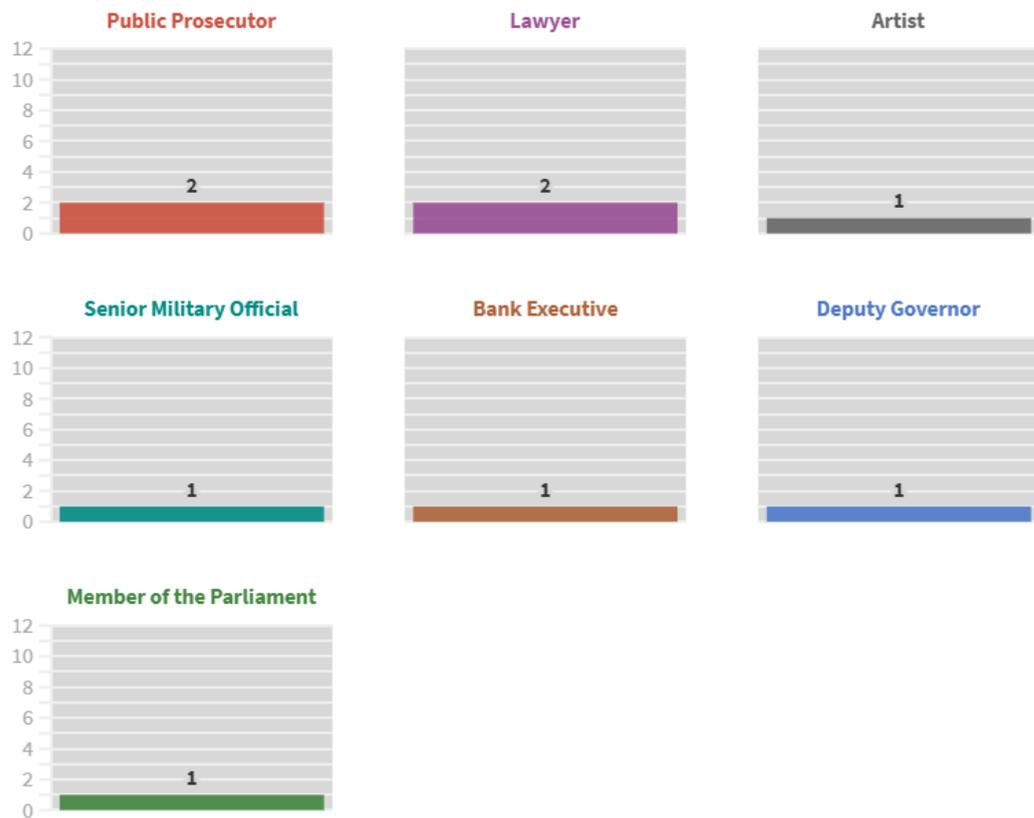
■ Violation of Personal Rights ■ Damage to Business Reputation ■ Privacy ■ The Right to Be Forgotten
■ Violation of Presumption of Innocence ■ Absence of Public Interest



It is notable that the majority of the complainants against ODA TV were **mayors** (12 items). The other complainants include **companies** (5 items) and **civilians** (5 items). Out of the 12 news pieces targeted by **mayors**, 11 were reports of ‘*corruption and irregularities*’ and ‘*misconduct*’, and all of these takedown orders were based on ‘*violation of personal rights*’.

Vocational Positions of Complainants





There were removal requests for 5 news pieces, all of which were reports of ‘*corruption and irregularities*’, and these requests were placed by **companies** on the grounds of ‘*damage to business reputation*’. The news reports which targeted by **civilians** (5 items) were primarily related to incidents involving ‘*assault and bodily harm*’. The majority of the content removal orders on these news articles were based on ‘*privacy*’ (3 items).

T24

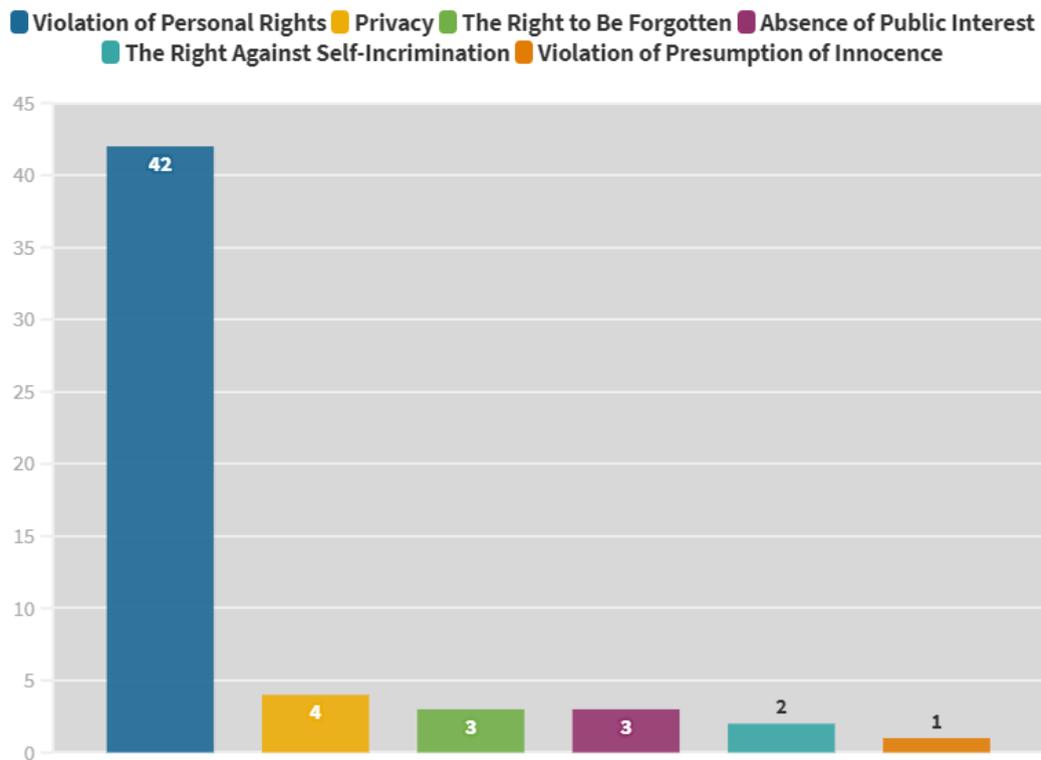
In our research, 47 takedown orders were issued for the news content published by T24, a digital news outlet. In this context, T24 was in the fourth place in terms of the number of issued content removal requests. 26 out of these 47 orders targeted news reports on ‘*corruption and irregularities*’, followed by ‘*misconduct*’ (17 items) and ‘*murder*’ (6 items). Besides, 8 news reports included allegations on ‘*corruption and irregularities*’ in addition to ‘*misconduct*’. The complainants who placed content removal requests for three out of these 8 news reports were **ministers**.

Distribution of News Topics Requested to be Taken Down



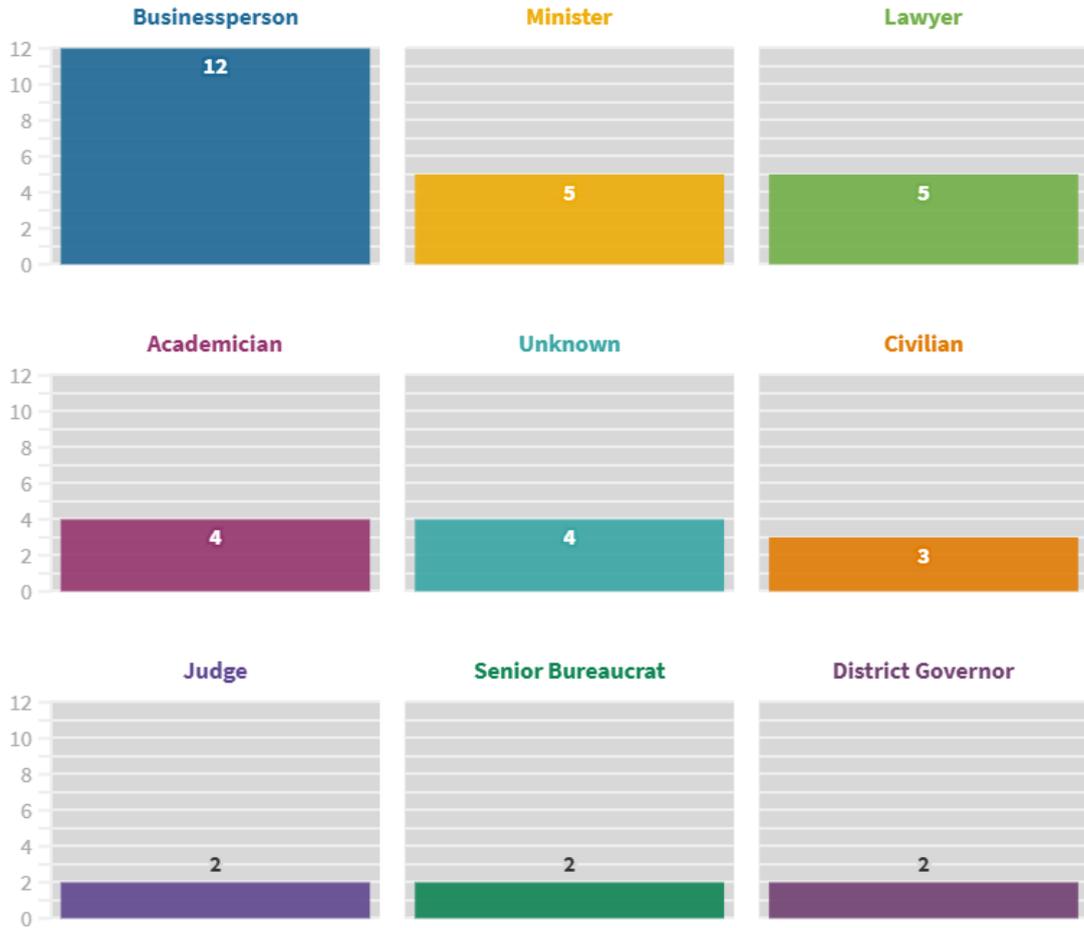
The majority of the takedown orders issued against T24 were based on ‘*violation of personal rights*’ (42 items), followed by ‘*privacy*’ (4 items), ‘*absence of public interest*’ (3 items) and the ‘*right to be forgotten*’ (3 items).

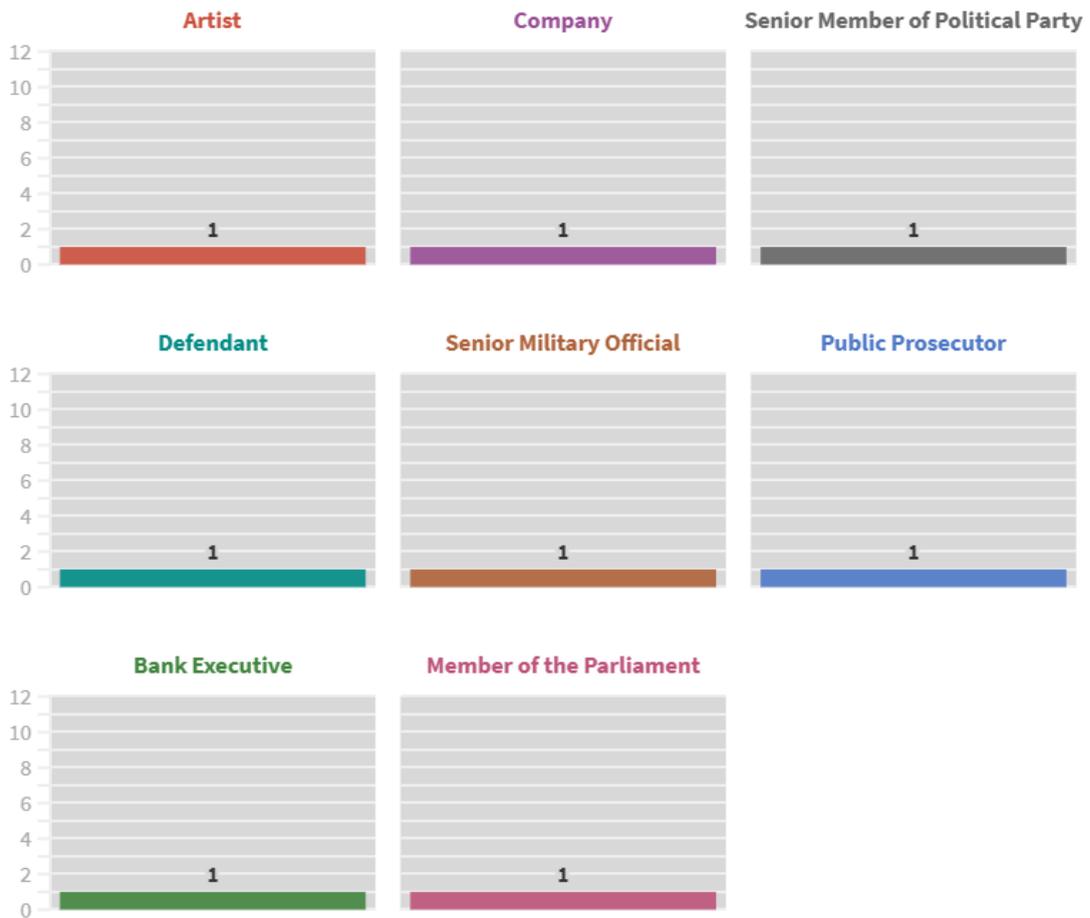
Justifications for Content Removal Requests



The complainants who placed takedown requests against the news outlet are: **Business people** (12 items), **lawyers** (5 items), and **ministers** (5 items). It must be noted that for three out of six news reports on murder cases and for seven out of 26 news reports on ‘*corruption and irregularities*’, content removal requests were filed by **business people**. In addition, all of the removal requests regarding 12 news articles covering allegations against business people were based on ‘*violation of personal rights*’.

Vocational Positions of Complainants



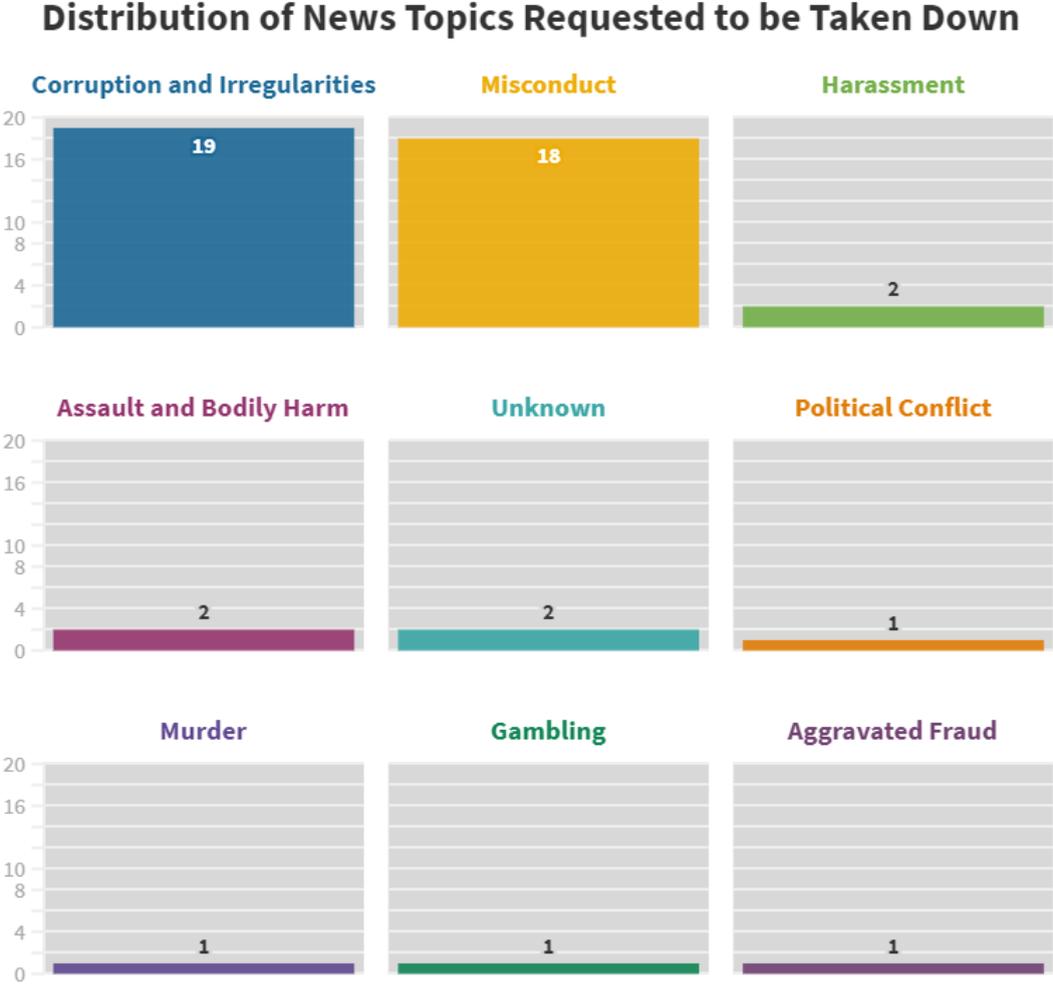


There were five removal requests placed by **lawyers**, including four news reports on ‘*corruption and irregularities*’ and one article about ‘*misconduct*’. All of the removal requests were based on ‘*violation of personal rights*’. Three out of five news items involving ministers included allegations of both ‘*corruption and irregularities*’ and ‘*misconduct*’. The other two news reports were about ‘*political conflict*’. All of the takedown orders were based on ‘*violation of personal rights*’.

Sözcü

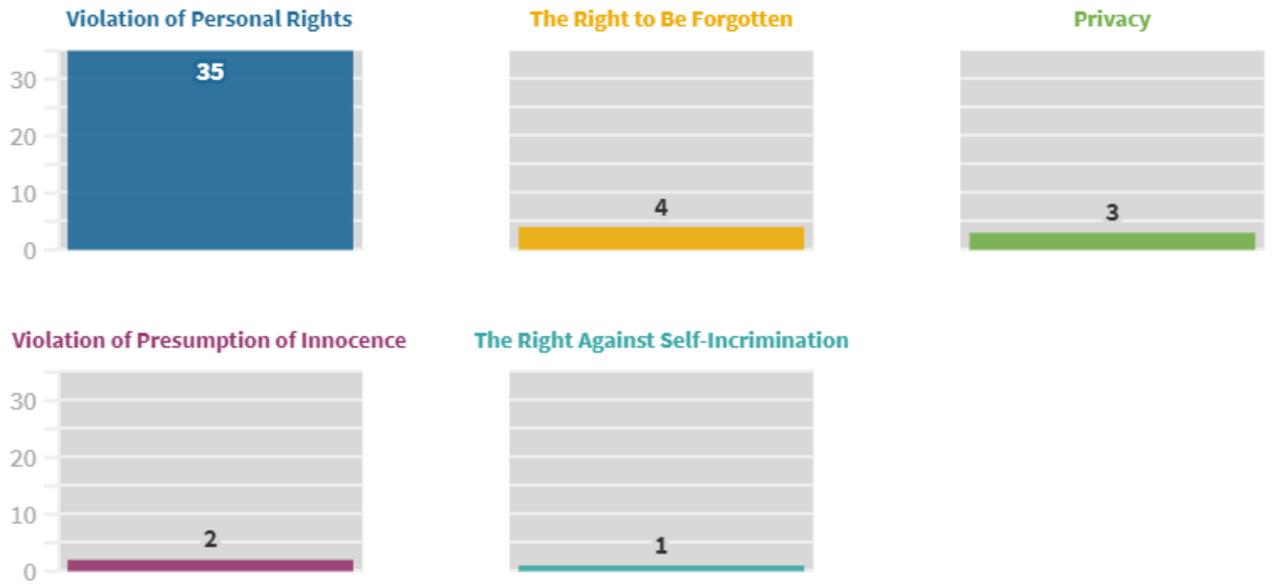
There were 39 takedown orders issued against the news reports published on the website of Sözcü, a daily newspaper. The majority of these orders were placed to take down news reports on ‘*corruption and irregularities*’ (19 items) and ‘*misconduct*’ (18 items). Six news items reported allegations of ‘*corruption and irregularities*’ accompanied by ‘*misconduct*’,

including three news articles involving **senior bureaucrats** and two articles involving **ministers**. Besides, two news reports contained allegations of ‘*misconduct*’ and ‘*harassment*’.



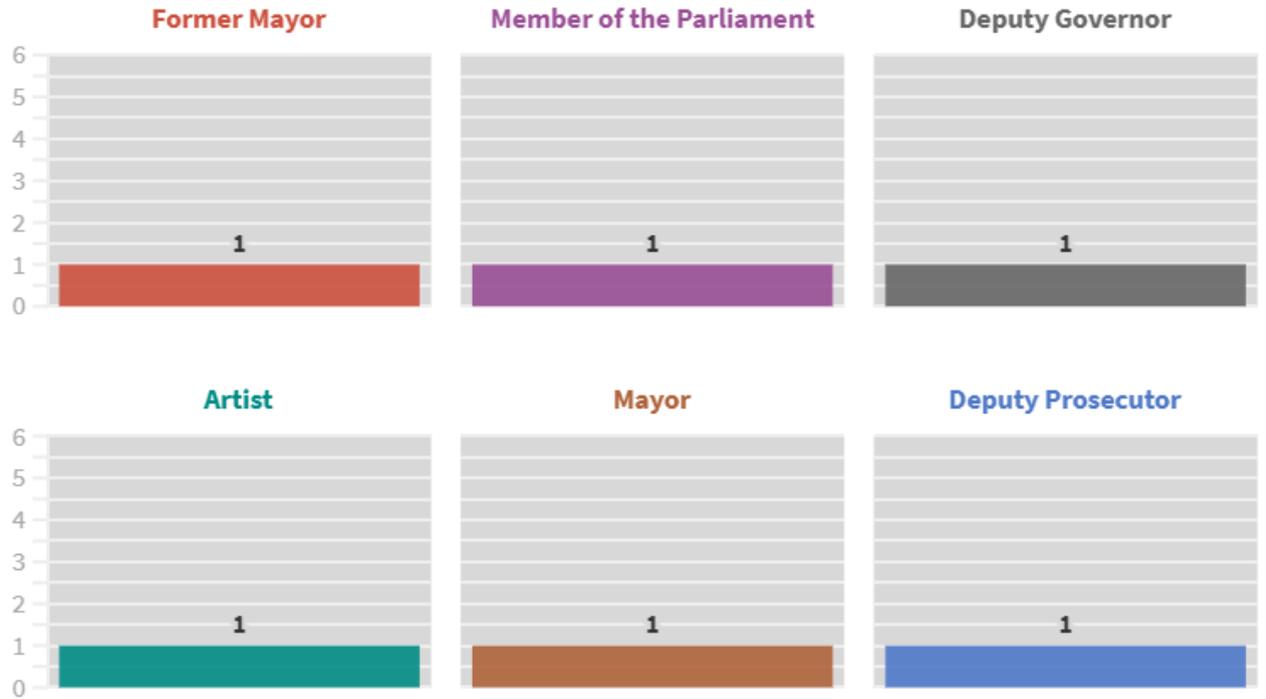
The significant majority of the content removal requests placed against Sözcü were based on ‘*violation of personal rights*’ (35 items), followed by the ‘*right to be forgotten*’ (4 items) and ‘*privacy*’ (3 items). Furthermore, an outstanding majority of the complainants were **senior members of political parties** (6 items) and **senior bureaucrats** (5 items).

Justifications for Content Removal Requests



Vocational Positions of Complainants





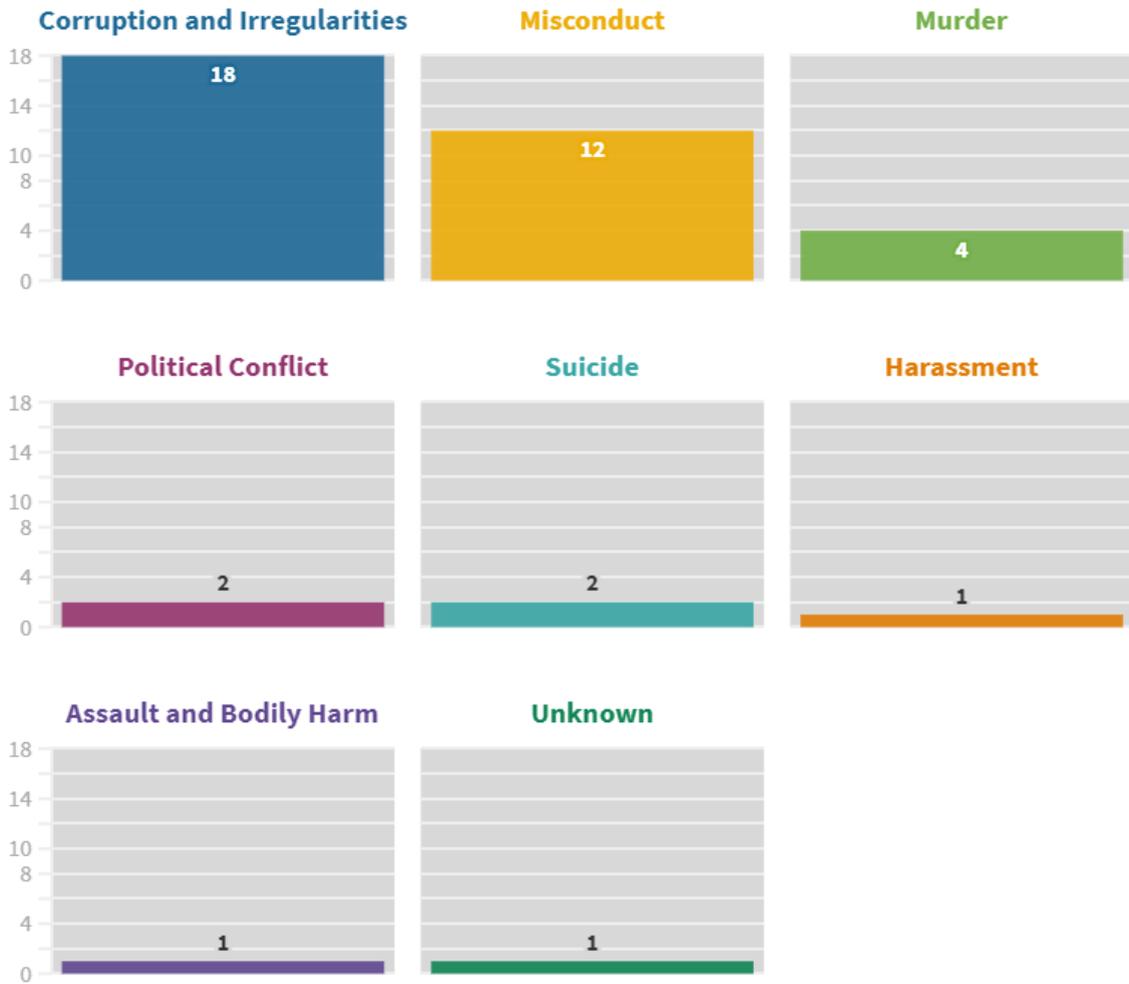
Two out of six news reports about senior members of political parties featured allegations of both ‘*misconduct*’ and ‘*harassment*’. Besides, 3 news reports were about ‘*misconduct*’ and one reported claims of ‘*corruption and irregularities*’. The takedown orders for two news articles were based on a combination of ‘*violation of personal rights*’ and the ‘*right to be forgotten*’, and the remaining orders were placed solely on the basis of ‘*violation of personal rights*’.

All of the five news reports about **senior bureaucrats** featured allegations of ‘*corruption and irregularities*’; however, three of these reports also included elements involving ‘*misconduct*’. The takedown orders were often based on an alleged ‘*violation of personal rights*’ (3 items).

Gerçek Gündem

Gerçek Gündem was in the sixth place among the news outlets which were often targeted by content removal orders. The online news portal received 36 orders to remove content, the majority of which were reports about ‘*corruption and irregularities*’ (18 items), ‘*misconduct*’ (12 items) and ‘*murder*’ (4 items). In total there were four news items which reported on both ‘*corruption and irregularities*’ and ‘*misconduct*’. One news article reported ‘*harassment*’ in addition to ‘*misconduct*’.

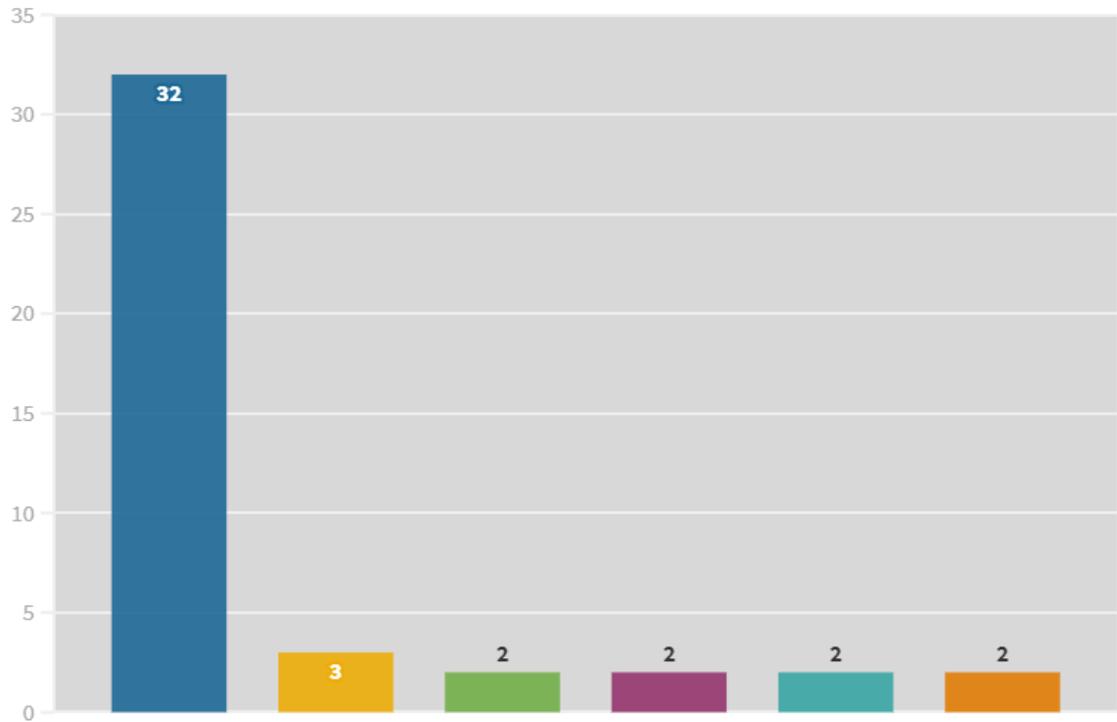
Distribution of News Topics Requested to be Taken Down



The majority of these requests cited ‘*violation of personal rights*’ (32 items). This justification was primarily mentioned in the requests placed by **business people** (9 items), followed by **ministers** (4 items).

Justifications for Content Removal Requests

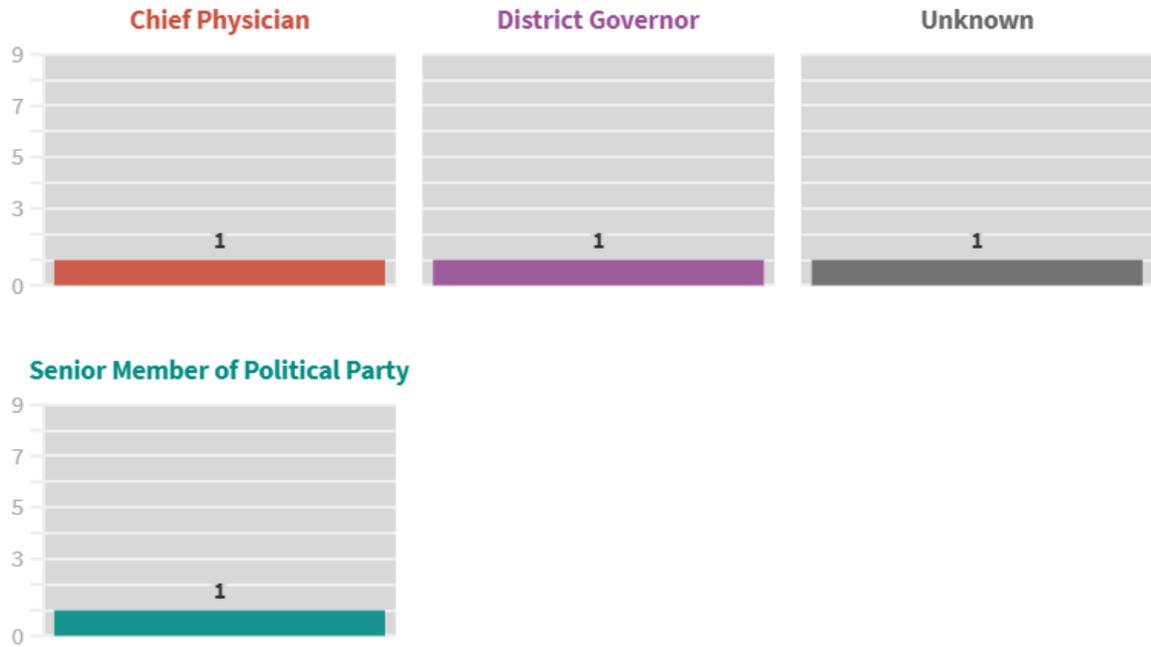
■ Violation of Personal Rights ■ Absence of Public Interest ■ Privacy ■ The Right to Be Forgotten
■ Violation of Presumption of Innocence ■ The Right Against Self-Incrimination



Furthermore, the significant majority of the takedown requests against Gerçek Gündem came from **business people** (9 items), followed by **lawyers** (6 items) and **ministers** (4 items).

Vocational Positions of Complainants



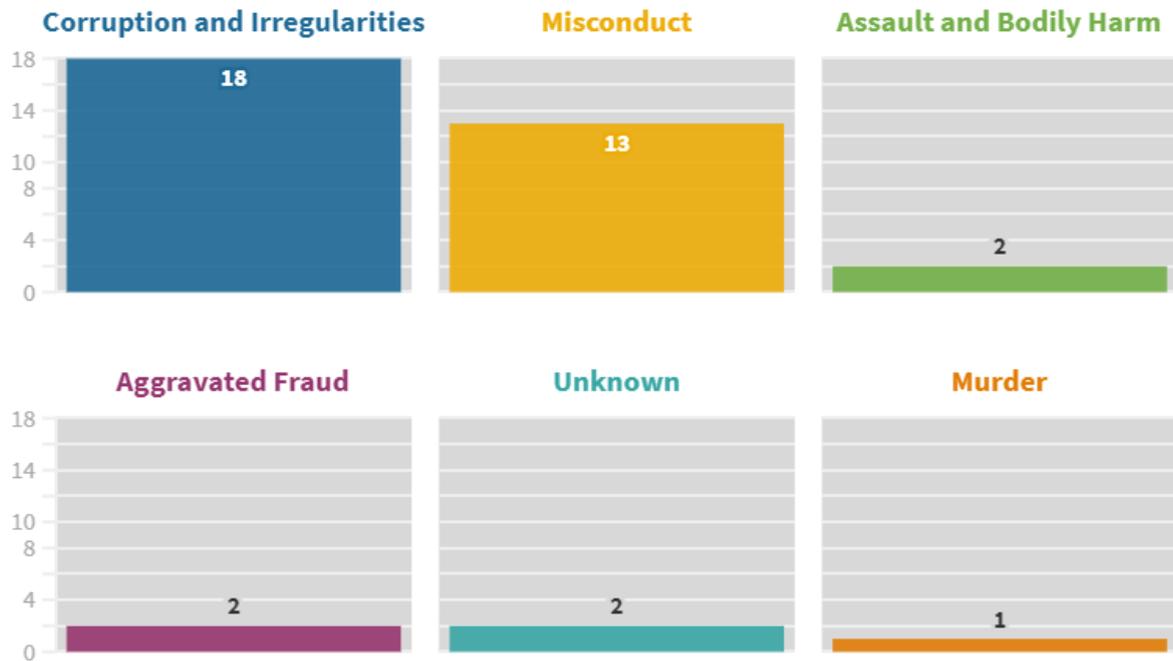


Besides, the majority of the actors in the news reports about allegations of ‘*corruption and irregularities*’ were also **business people** (5 items). On the other hand, the perpetrators in news reports involving ‘*misconduct*’ were **business people** (2 items), **senior bureaucrats** (2 items) and **ministers** (2 items). Two news reports about **senior bureaucrats** included allegations of ‘*corruption and irregularities*’ accompanied by ‘*misconduct*’, while one news article about a **senior member of a political party** reported both ‘*misconduct*’ and ‘*harassment*’.

dokuz8HABER

According to research findings, 36 content removal orders were sent to dokuz8HABER, an independent online news outlet. Therefore, dokuz8HABER received the seventh highest number of takedown orders among online media outlets. 18 orders were placed for news reports on ‘*corruption and irregularities*’, while 13 targeted news items on ‘*misconduct*’. Besides, there were two news items which reported both ‘*corruption and irregularities*’ and ‘*misconduct*’.

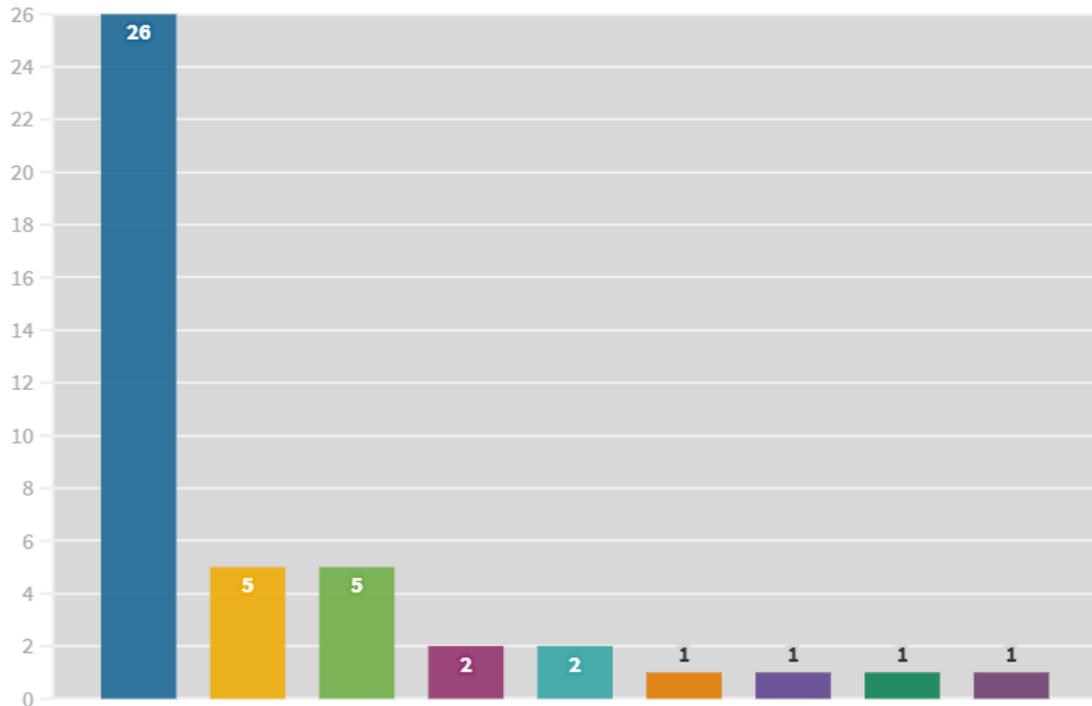
Distribution of News Topics Requested to be Taken Down



The most cited justification in these orders was the ‘*violation of personal rights*’ (26 items). Other justifications include: ‘*Damage to business reputation*’ (5 items), and ‘*privacy*’ (5 items).

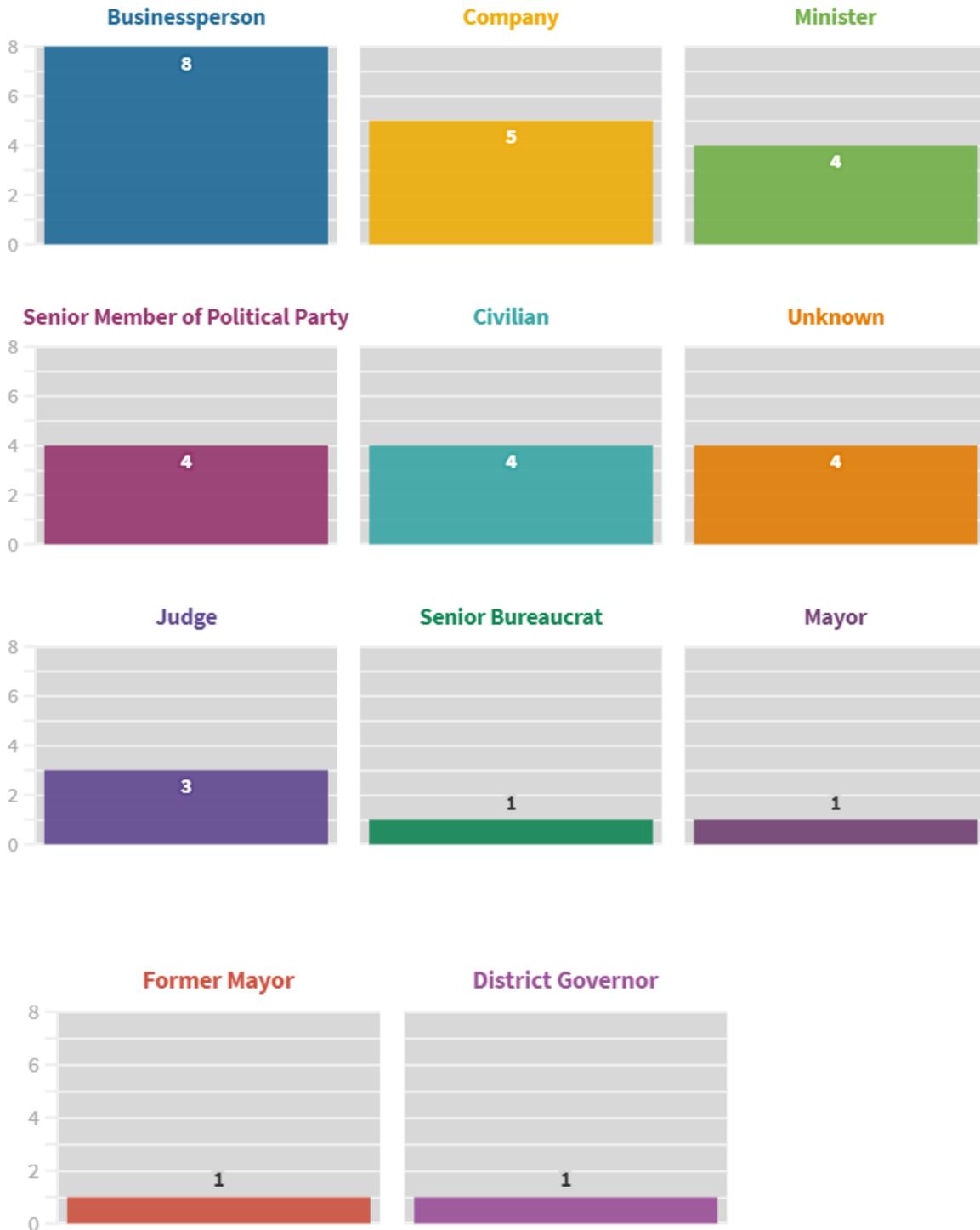
Justifications for Content Removal Requests

■ Violation of Personal Rights ■ Damage to Business Reputation ■ Privacy ■ Violation of Presumption of Innocence
■ The Right Against Self-Incrimination ■ Absence of Public Interest ■ The Right to Be Forgotten
■ Violation of Child's Safety Policy (YouTube) ■ Copyright Violation



The majority of the complainants were **business people** (8 items), followed by **companies** (5 items), **ministers** (4 items) and **senior members of political parties** (4 items).

Vocational Positions of Complainants

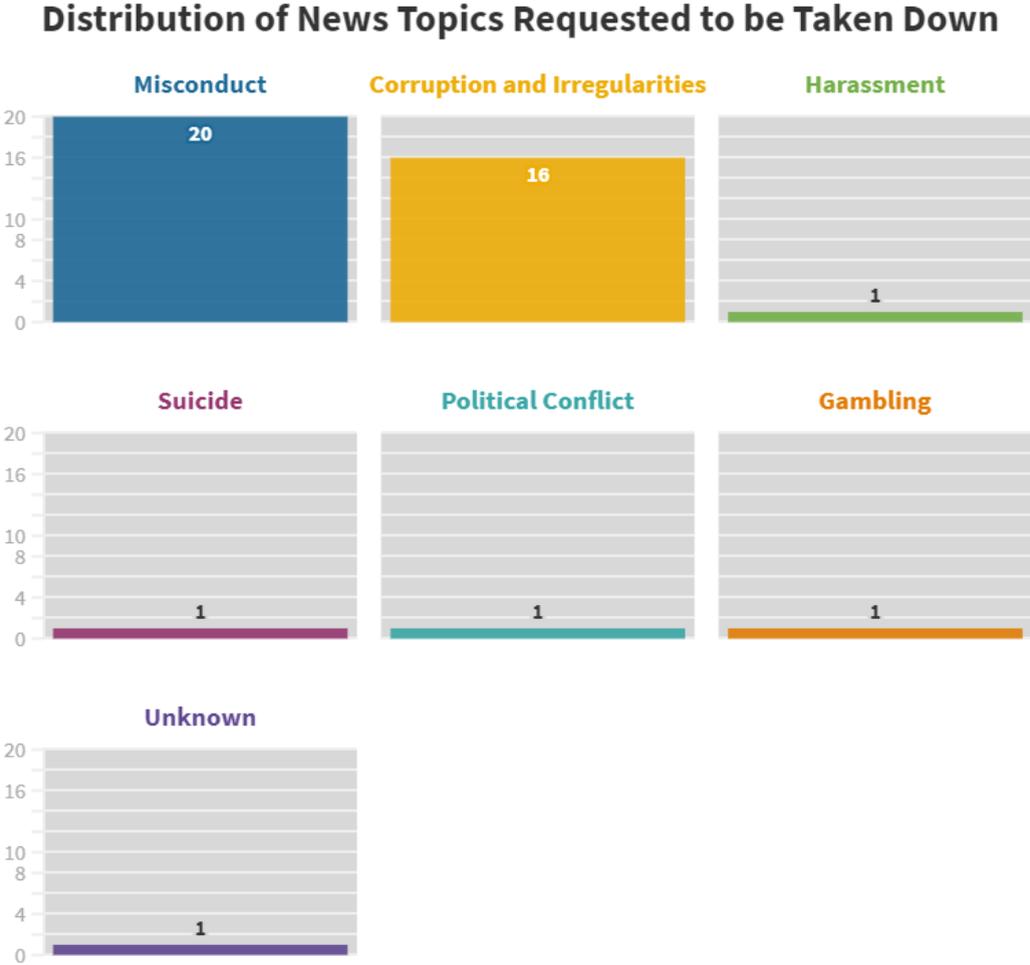


The actors in news reports on ‘*corruption and irregularities*’ (6 items) were predominantly **business people**. Besides, all of the 8 requests placed by **business people** were based on ‘*violation of personal rights*’.

On the other side, all of the court cases filed by **companies** (5 items) targeted news reports on ‘*corruption and irregularities*’, and the content was blocked on the basis of ‘*damage to business reputation*’.

SoL Haber

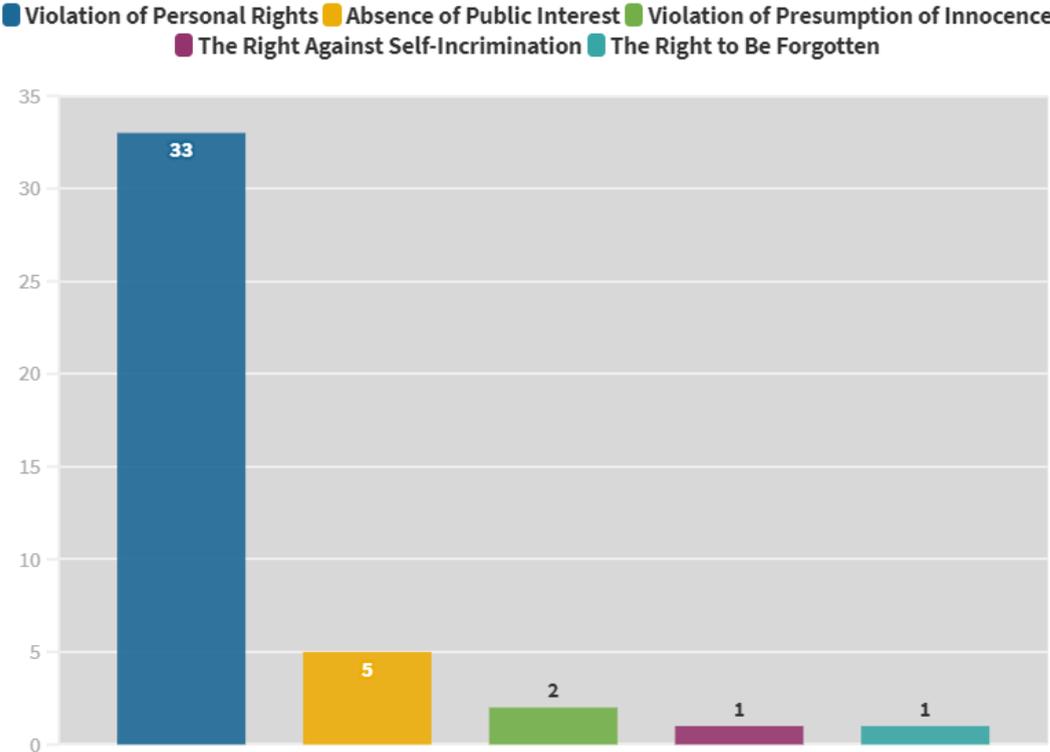
With 34 content removal requests, SoL Haber, an online news portal, was in the 8th place among the news outlets in the scope of this research. However, unlike other online media outlets, SoL Haber received more takedown orders for news reports on ‘*misconduct*’ than for the content on ‘*corruption and irregularities*’. In this context, the outlet received 20 requests against news reports on ‘*misconduct*’ and 16 requests against news items on ‘*corruption and irregularities*’.



33 out of 34 takedown requests were based on ‘*violation of personal rights*’. 8 requests were placed by **lawyers** and 6 were placed by **ministers**, and all of these requests were approved

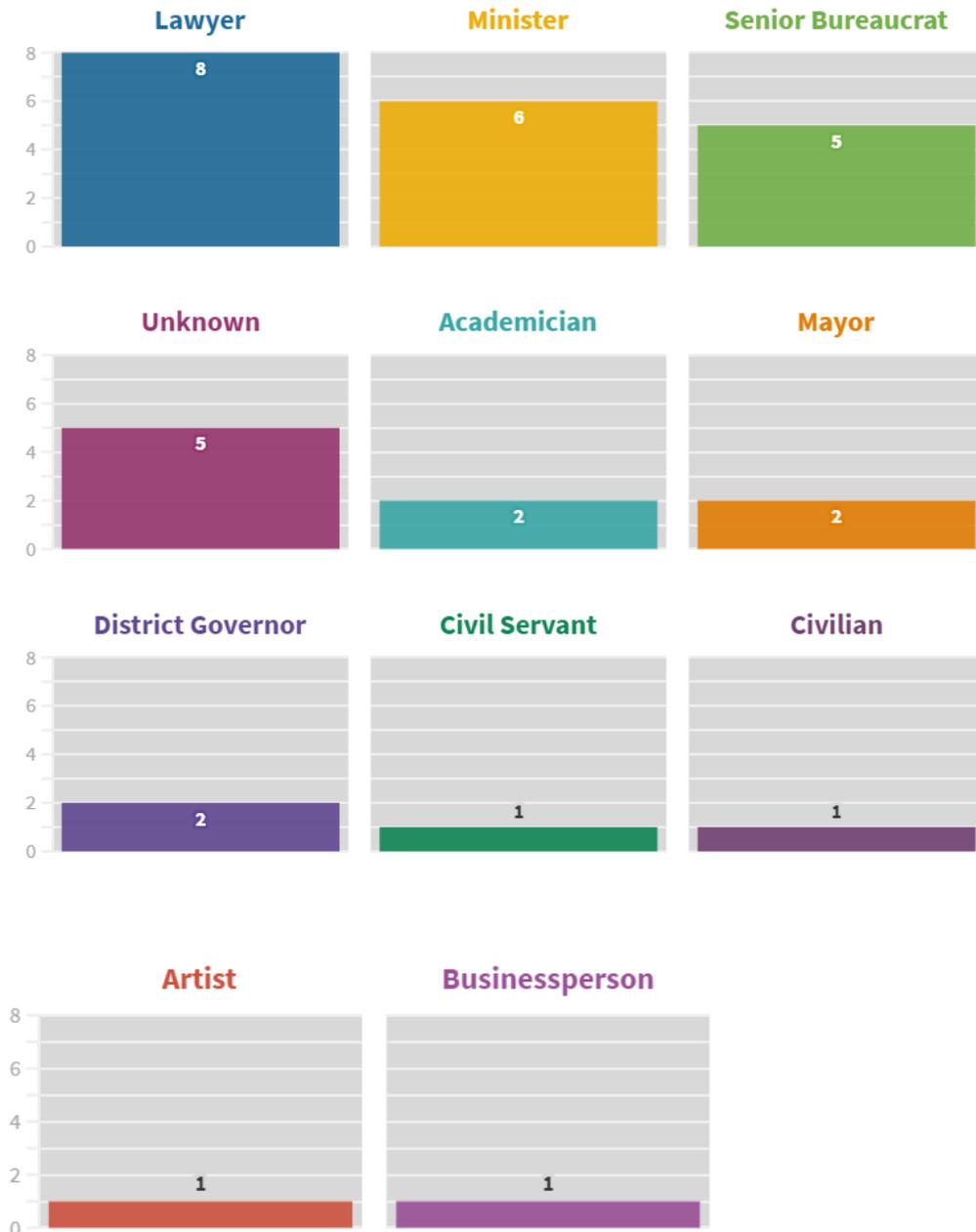
on the basis of ‘*violation of personal rights*’. Five requests cited ‘*absence of public interest*’ in addition to ‘*violation of personal rights*’. These five requests were placed by **lawyers** (3 items) and **district governors** (2 items).

Justifications for Content Removal Requests



The complainants who placed content removal requests against SoL Haber can be listed as follows: **Lawyers** (8 items), **ministers** (6 items), **senior bureaucrats** (5 items), and **academics** (2 items).

Vocational Positions of Complainants

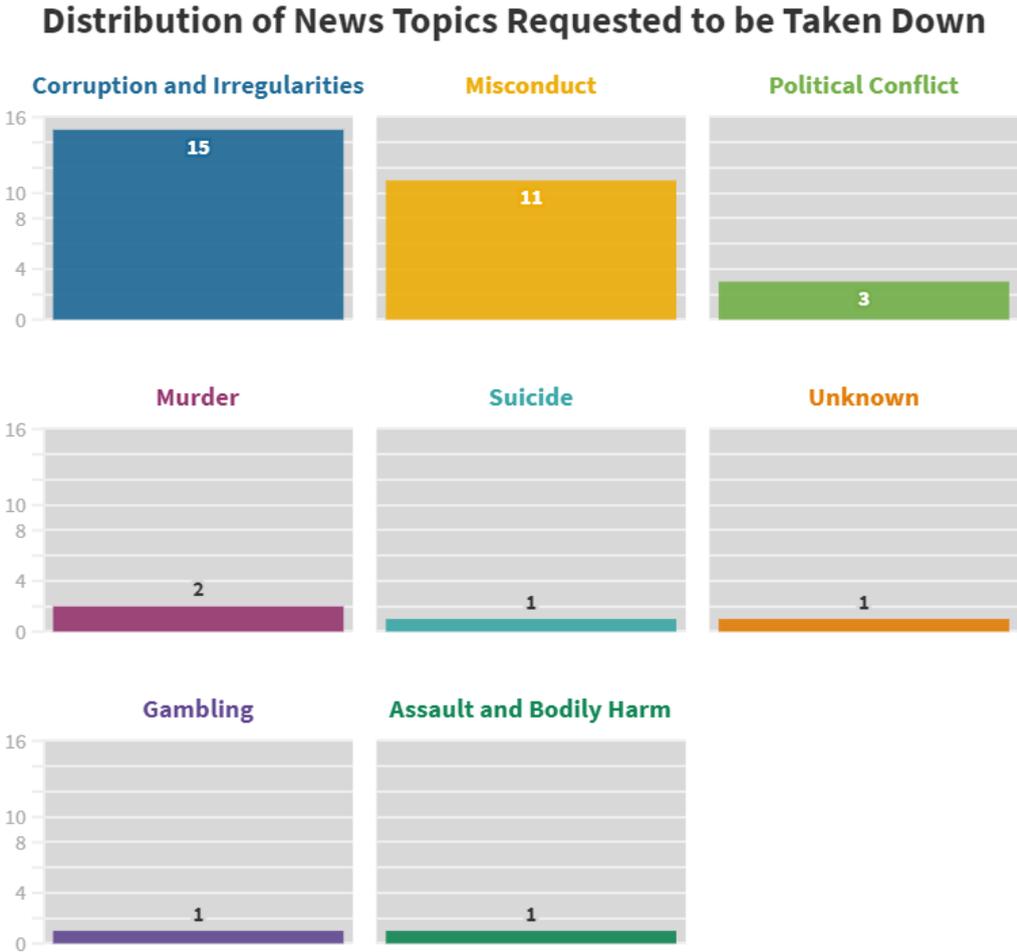


The majority of the complainants against news reports on ‘*corruption and irregularities*’ were **lawyers** (5 items) while the majority of the takedown requests against news articles on ‘*misconduct*’ were placed by **ministers** (5 items) and **senior bureaucrats** (4 items). 6 articles reported allegations of both ‘*misconduct*’ and ‘*corruption and irregularities*’. Four of these news articles were taken to court by **senior bureaucrats**, and the other two were targeted by **ministers**. One of these news articles reported both ‘*harassment*’ and ‘*misconduct*’.

5 out of 8 news reports involving **lawyers** were about ‘*corruption and irregularities*’ and the remaining three articles were reports of ‘*misconduct*’. All of the takedown orders placed against these news items were based on ‘*violation of personal rights*’. Two out of six news reports about **ministers** contained allegations of both ‘*corruption and irregularities*’ and ‘*misconduct*’. The other three news reports were about ‘*misconduct*’, and one was a report about a ‘*political conflict*’.

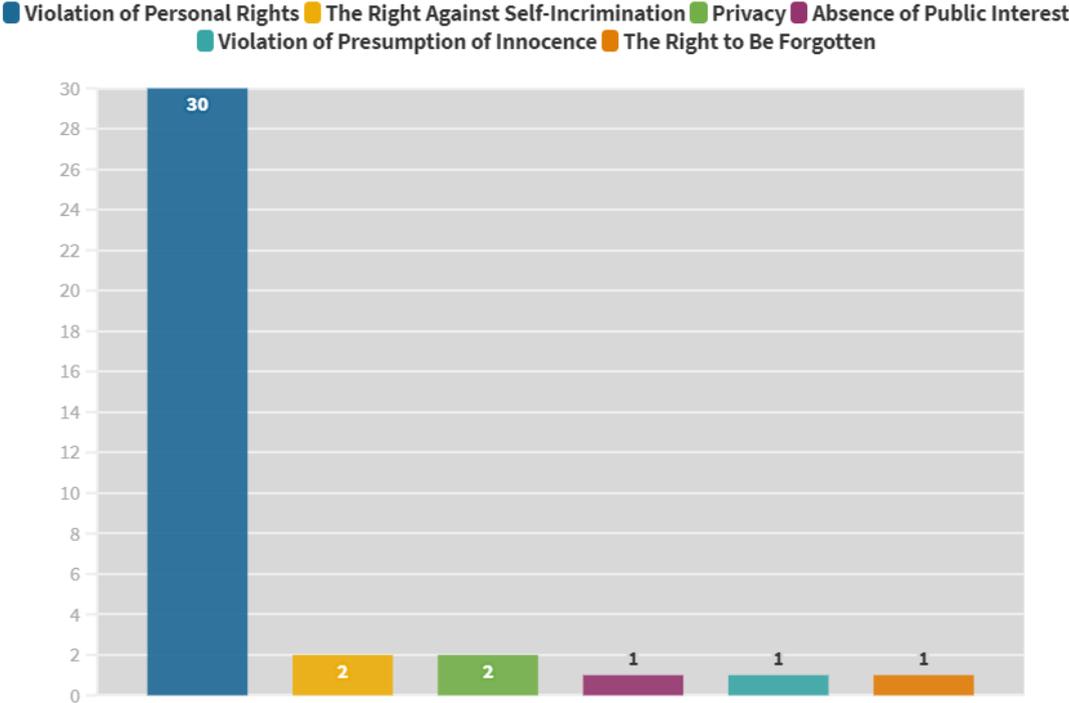
TELE1

TELE1, a left-wing news channel, received 32 orders to take down news content from its website, standing in 9th place among all news outlets. The majority of the content taken down was reports of ‘*corruption and irregularities*’ (15 articles), followed by ‘*misconduct*’ (11 items). There were also 3 news articles reporting on both themes.

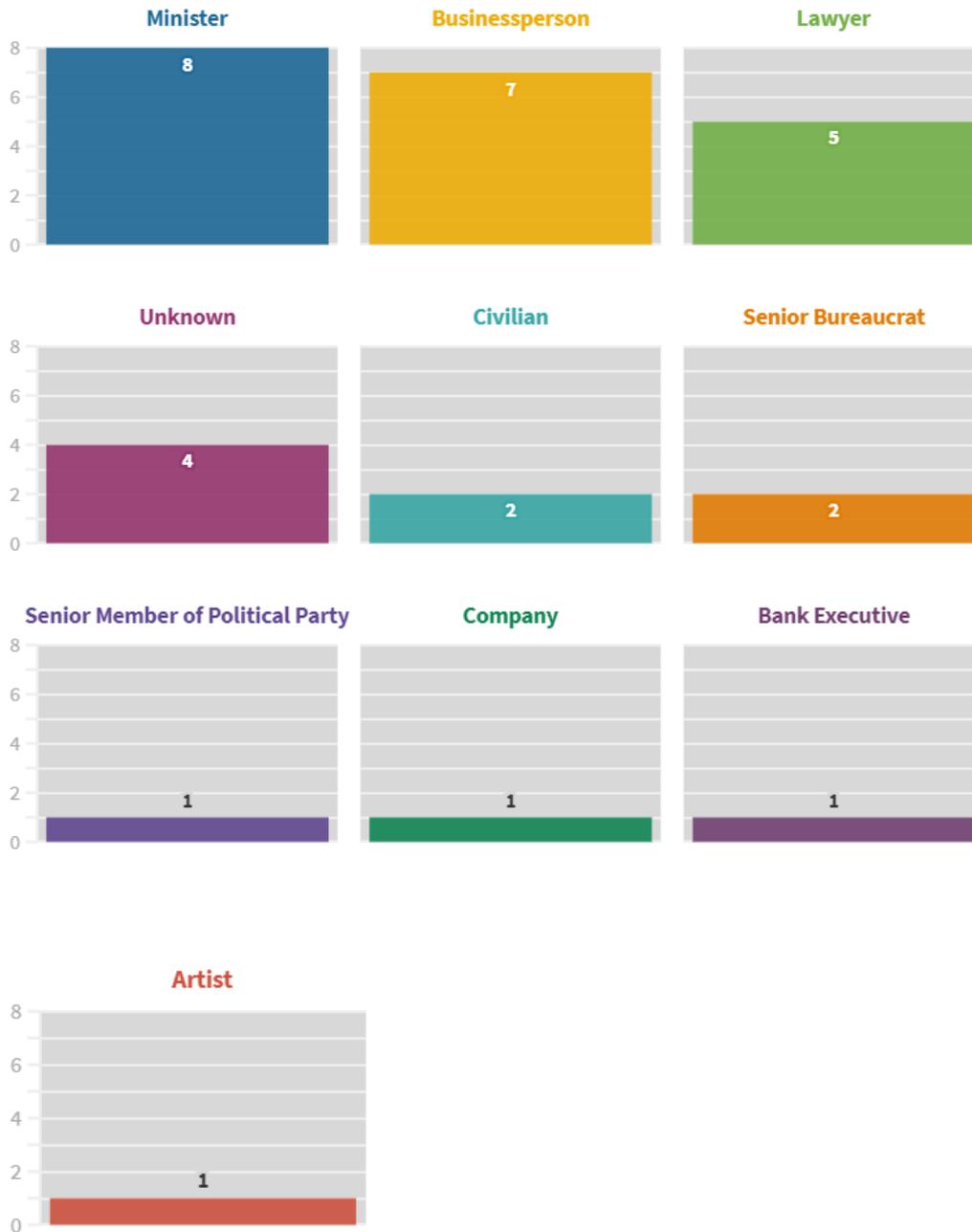


30 out of 32 takedown requests were based on ‘*violation of personal rights*’. The complainants who cited ‘*violation of personal rights*’ were predominantly **ministers** (8 items). Furthermore, the majority of the individuals who filed requests to take down news reports on TELE1 were **ministers** (8 items), followed by **business people** (7 items) and **ministers** (5 items).

Justifications for Content Removal Requests



Vocational Positions of Complainants



The news reports on ‘*corruption*’ were mostly targeted by **lawyers** (4 items), and the majority of the news items on ‘*misconduct*’ were taken to court by **ministers** (5 items). Three of these news articles reported allegations of both ‘*corruption and irregularities*’ and ‘*misconduct*’. The majority of the complaints against these articles came from **ministers** (2 items).

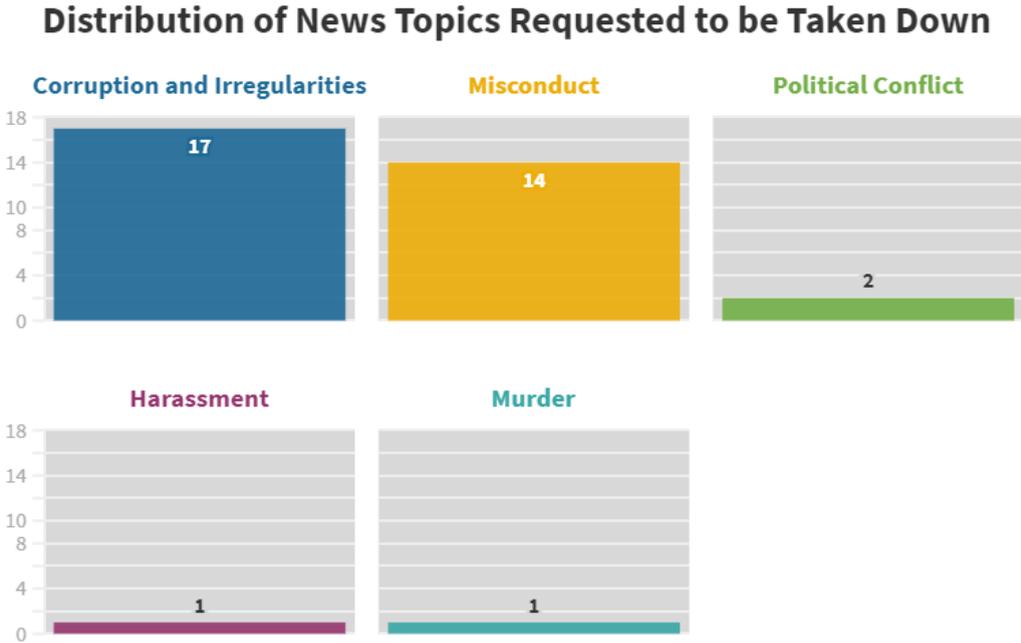
Five out of eight news articles involving **ministers** were about ‘*misconduct*’, and the others were reports of ‘*political conflict*’. Two news reports described actions involving both

'corruption and irregularities' and 'misconduct.' All of the takedown orders were based on 'violation of personal rights'. **Business people** filed complaints to take down news reports citing 'corruption and irregularities' (3 items), 'misconduct' (2 items) and 'murder' (2 items), all of which were accepted by authorities on the basis of 'violation of personal rights'.

Yeniçağ

Yeniçağ daily received 31 orders to remove news content from its website, and thus received the 10th highest number of takedown orders.

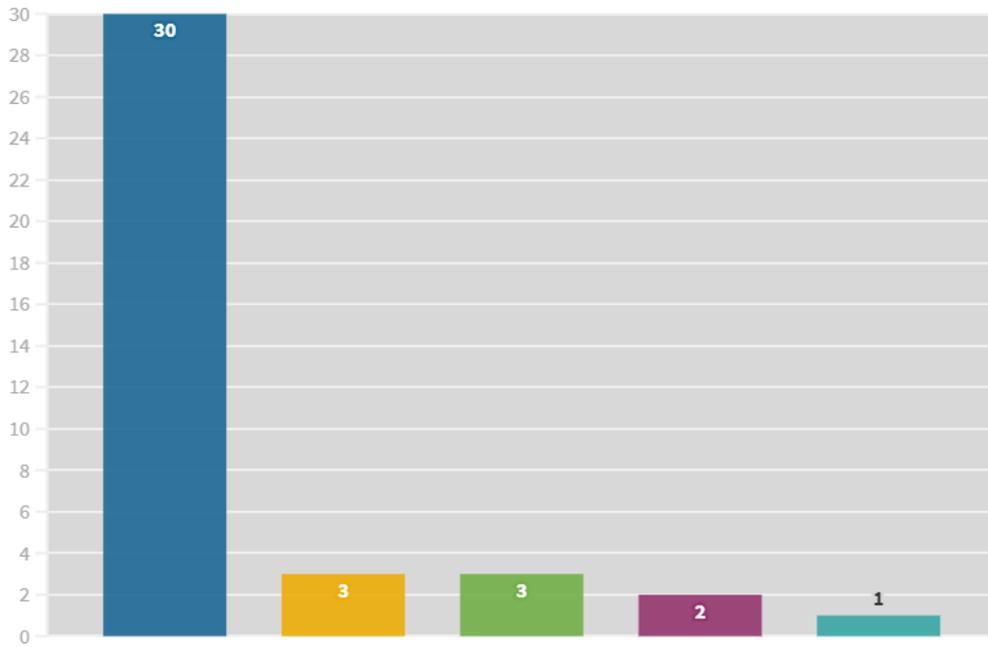
The orders included 17 news reports on 'corruption and irregularities', 14 news articles on 'misconduct'. Three news articles reported both 'corruption and irregularities' and 'misconduct'. In two articles, the alleged perpetrators were **ministers**. There was also one news article which reported 'misconduct' and 'harassment'.



The majority of the takedown orders placed against Yeniçağ were based on 'violation of personal rights' (30 items), and the complainants who cited this justification were predominantly **business people** (11 items).

Justifications for Content Removal Requests

■ Violation of Personal Rights ■ Absence of Public Interest ■ The Right to Be Forgotten ■ Privacy
■ The Right Against Self-Incrimination



In fact, the majority of the individuals who placed content removal requests against Yeniçağ were also **business people** (11 items), followed by **senior members of political parties** (4 items), **lawyers** (4 items), and **ministers** (4 items).

Vocational Positions of Complainants



Besides, 8 out of 11 news articles involving **business people** were about ‘*corruption and irregularities*’, and 4 were reports of ‘*misconduct*’. All of the takedown requests against these news reports were based on ‘*violation of personal rights*’.

Evrensel

With 26 takedown orders, Evrensel was in 11th place among the news outlets that received requests to remove content from their digital platforms. 15 out of these 26 news reports that were targeted were news reports on ‘*misconduct*’ and 12 were about ‘*corruption and irregularities*’. Furthermore, it should be noted that three news articles cited both ‘*misconduct*’ and ‘*corruption and irregularities*’. In all of these three news reports, the alleged perpetrators were **senior bureaucrats**. Besides, one news article contained allegations of ‘*misconduct*’ and ‘*harassment*’.

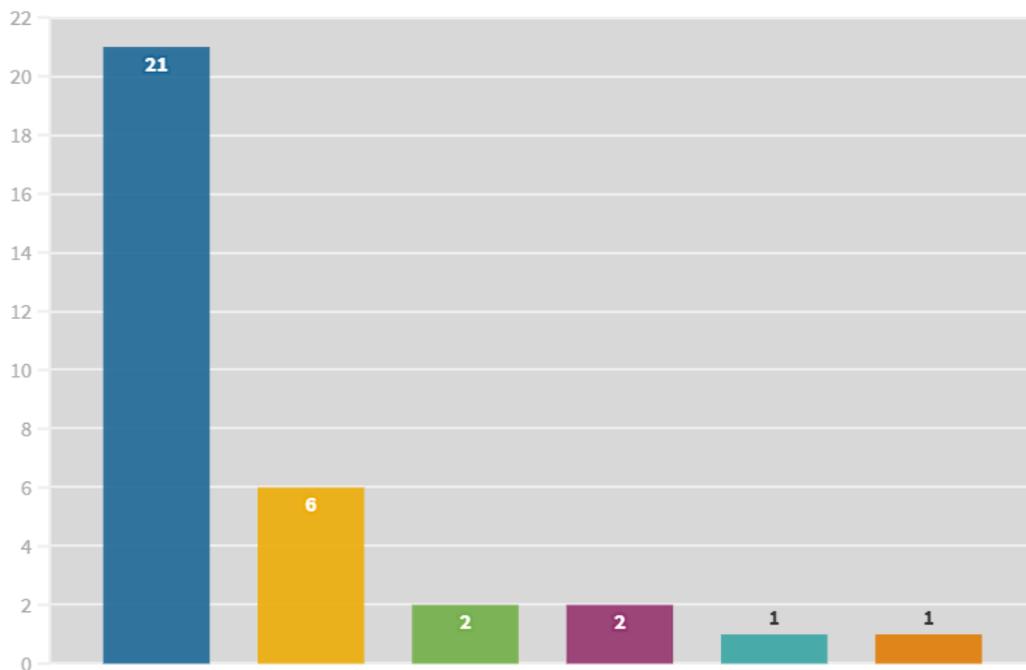
Distribution of News Topics Requested to be Taken Down



A review of the legal justifications for takedown orders placed against Evrensel reveals that the majority of the orders were based on ‘*violation of personal rights*’ (21 items) and the ‘*right to be forgotten*’ (6 items).

Justifications for Content Removal Requests

■ Violation of Personal Rights ■ The Right to Be Forgotten ■ Privacy ■ Damage to Business Reputation
■ Absence of Public Interest ■ Violation of Presumption of Innocence



The majority of the complainants were **senior bureaucrats** (4 items), **senior members of political parties** (4 items), and **companies** (3 items). However, the majority of the news items on ‘*misconduct*’ were taken to court by **senior bureaucrats** (3 items) and **senior members of political parties** (3 items). Besides, the majority of the complainants who targeted content on ‘*corruption and irregularities*’ were **senior bureaucrats** (4 items).

Vocational Positions of Complainants

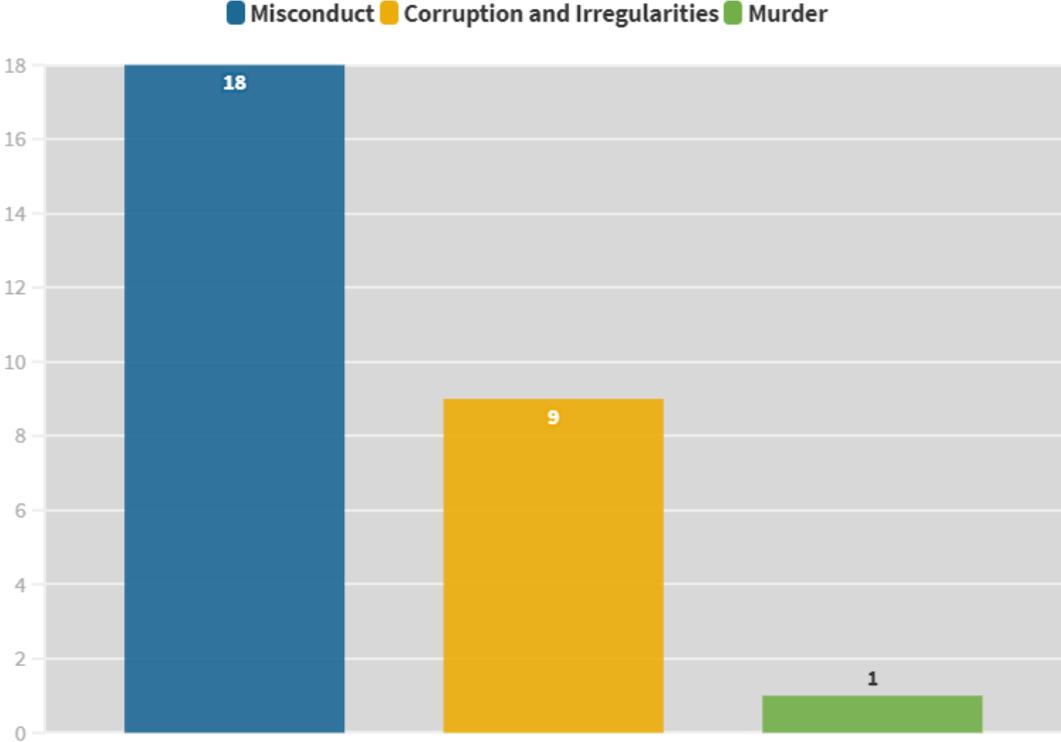


İleri Haber

23 content removal requests were submitted against İleri Haber, an online news platform, including 18 news reports about *'misconduct'* and 9 articles on *'corruption and irregularities'*. Besides, 5 articles reported both *'misconduct'* and *'corruption and irregularities'*.

irregularities'. In this cluster, the majority of the complainants were **senior bureaucrats** (4 items).

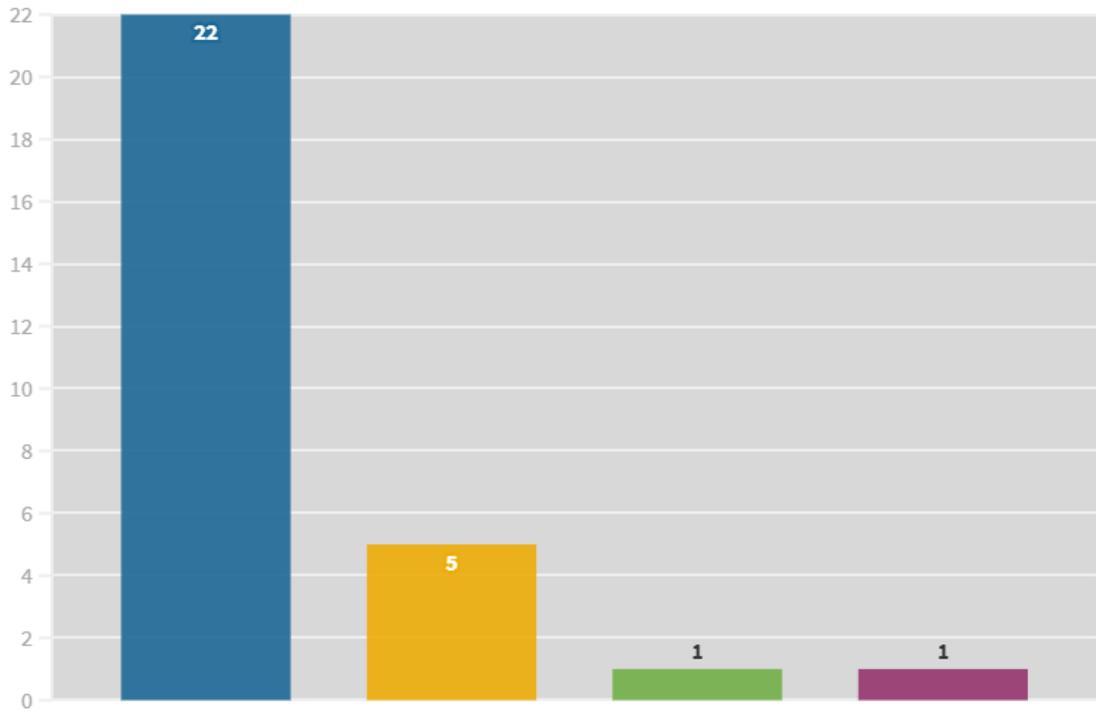
Distribution of News Topics Requested to be Taken Down



22 out of 23 news removal requests were based on '*violation of personal rights*'. In general, the majority of the takedown requests against İleri Haber were placed by **senior bureaucrats** (5 items) and **business people** (5 items). The complainants who placed takedown requests against news reports on '*misconduct*' were also **senior bureaucrats** and **business people**, with each group having filed 4 requests targeting content on '*misconduct*'. On the other hand, more than half of the content removal requests against news articles about '*corruption and irregularities*' were placed by **senior bureaucrats** (5 items).

Justifications for Content Removal Requests

■ Violation of Personal Rights ■ Absence of Public Interest ■ The Right to Be Forgotten
■ Violation of Presumption of Innocence



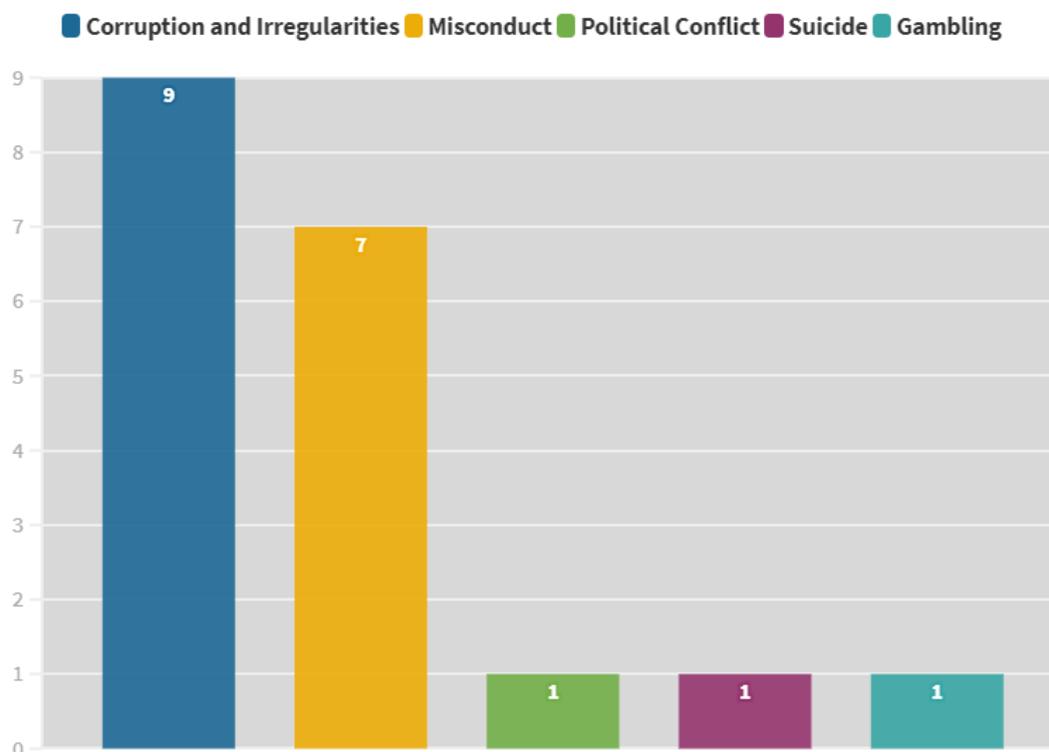
Vocational Positions of Complainants



Gazete Manifesto

In our review, we identified 18 content removal requests placed against the news content published by Gazete Manifesto, an online news outlet. 9 out of these 18 requests were placed against news reports on ‘*corruption and irregularities*’ and the remaining 7 requests targeted articles containing allegations of ‘*misconduct*’. Both offenses were mentioned in one news report.

Distribution of News Topics Requested to be Taken Down



All of the takedown orders against Gazete Manifesto were based on ‘*violation of personal rights*’. The majority of the alleged perpetrators in news articles on ‘*corruption and irregularities*’ were **lawyers** (3 items). Furthermore, the significant majority of all content removal requests against the news outlet were placed by **lawyers** (4 items). However, the majority of the takedown requests against news articles on ‘*misconduct*’ came from **ministers** (2 items).

Vocational Positions of Complainants

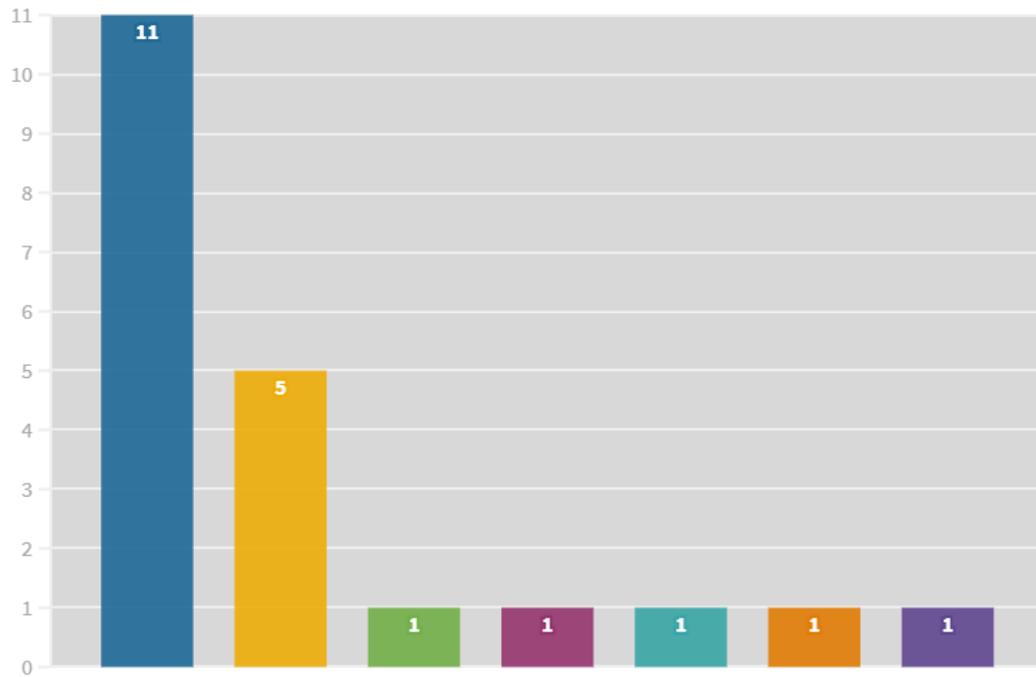


ABC Gazetesi

18 content removal orders were placed against ABC Gazetesi, an online news platform. Out of 18 articles, 11 were reports of ‘*corruption and irregularities*’ and 5 were about ‘*misconduct*.’ Besides, two news reports cited allegations of both ‘*corruption and irregularities*’ and ‘*misconduct*’.

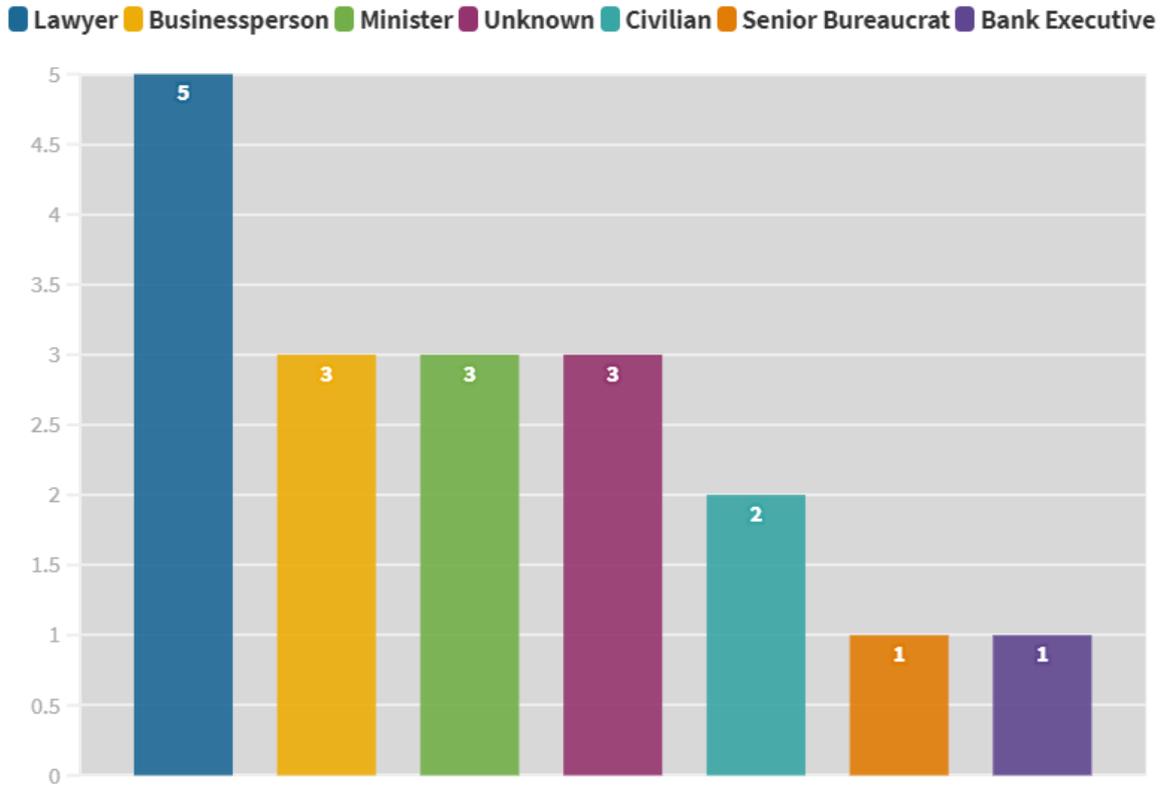
Distribution of News Topics Requested to be Taken Down

■ Corruption and Irregularities ■ Misconduct ■ Political Conflict ■ Assault and Bodily Harm ■ Suicide ■ Harassment ■ Unknown



16 out of 18 takedown requests were based on *'violation of personal rights'*. The complainants include: **lawyers** (5 items), **ministers** (3 items), and **business people** (3 items).

Vocational Positions of Complainants

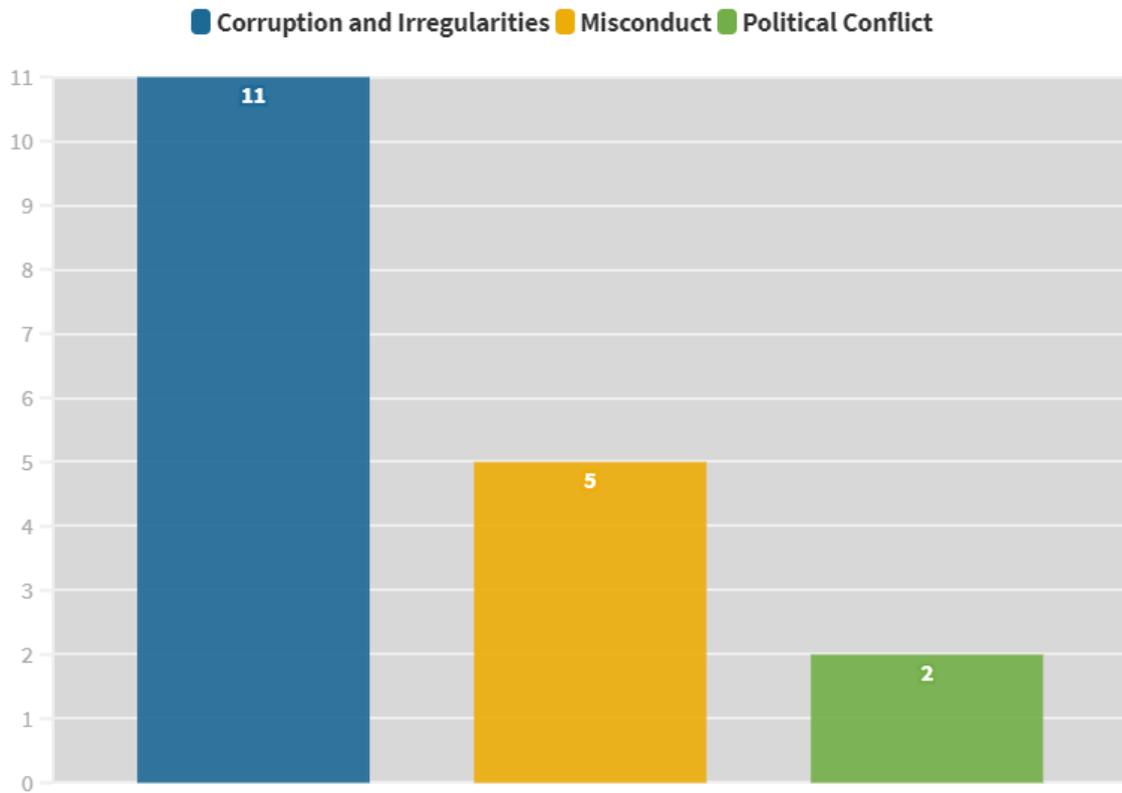


The majority of the takedown requests against news reports on ‘*corruption and irregularities*’ (4 items) came from **lawyers** (5 items). Besides, all of the applications filed by **lawyers** were approved on grounds of ‘*violation of personal rights*’.

Artı Gerçek

Authorities placed 17 takedown orders against Artı Gerçek, an online news outlet, including 11 news reports on ‘*corruption and irregularities*’ and 5 articles on ‘*misconduct*’. Furthermore, one news article about a **minister** featured allegations of ‘*corruption and irregularities*’ as well as ‘*misconduct*’.

Distribution of News Topics Requested to be Taken Down



All of the takedown orders were based on '*violation of personal rights*'. The majority of the complainants were **ministers** (5 items), and **business people** (3 items).

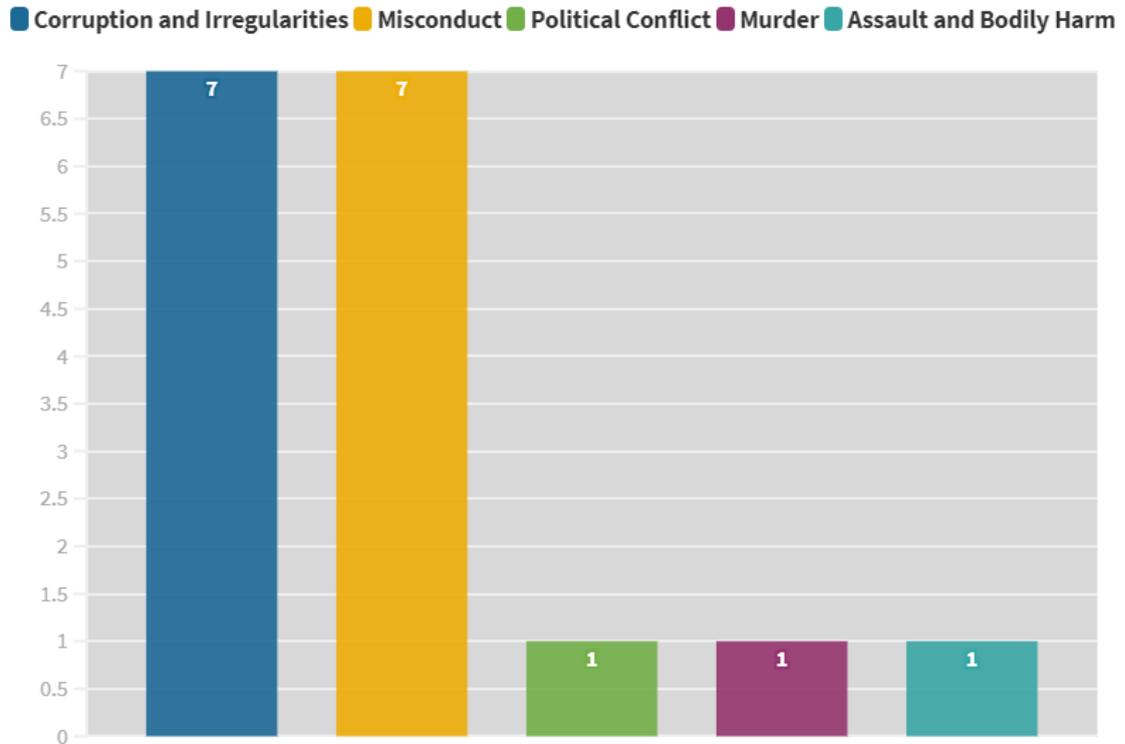
Vocational Positions of Complainants



Duvar

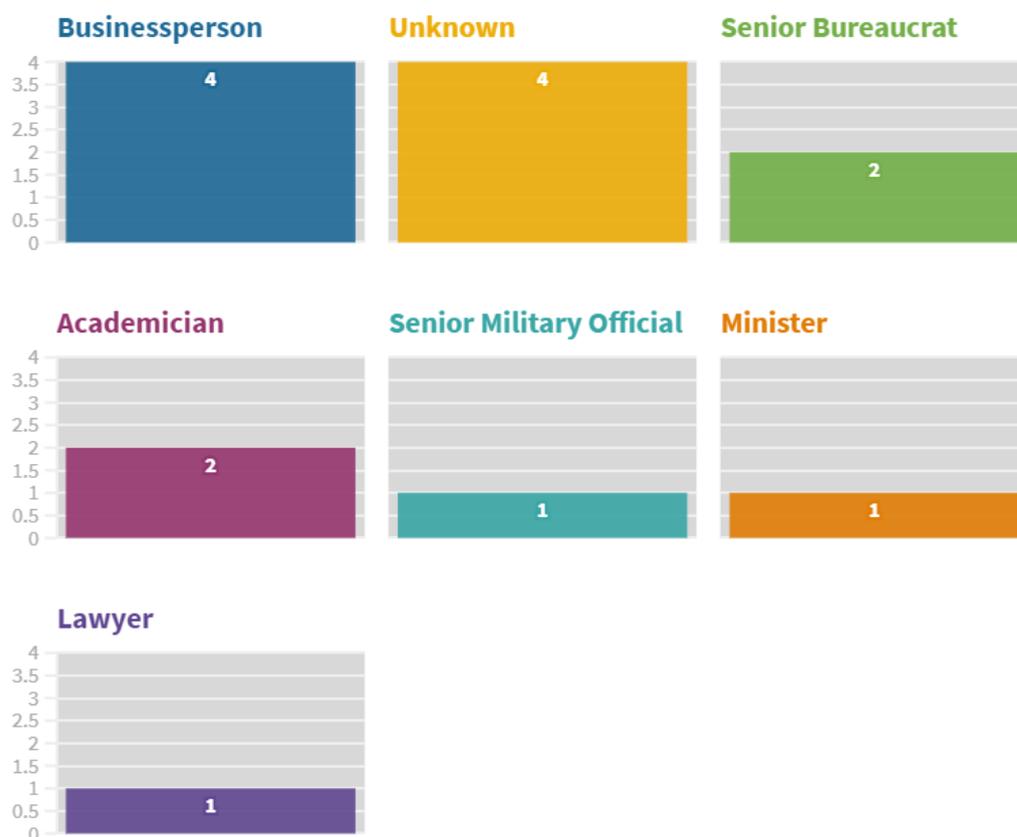
Duvar, an online newspaper, received 15 content removal orders. 7 takedown orders were placed to remove news on ‘*corruption and irregularities*’ and the other requests targeted articles on ‘*misconduct*’. In addition, the list included two news content which reported ‘*corruption and irregularities*’ as well as ‘*misconduct*’ by **senior bureaucrats**.

Distribution of News Topics Requested to be Taken Down



There were 11 content removal requests based on ‘*violation of personal rights*’, while the ‘*right to be forgotten*’ was cited in 3 requests. The majority of the takedown requests were placed by **business people** (4 items), **senior bureaucrats** (2 items), and **academics** (2 items).

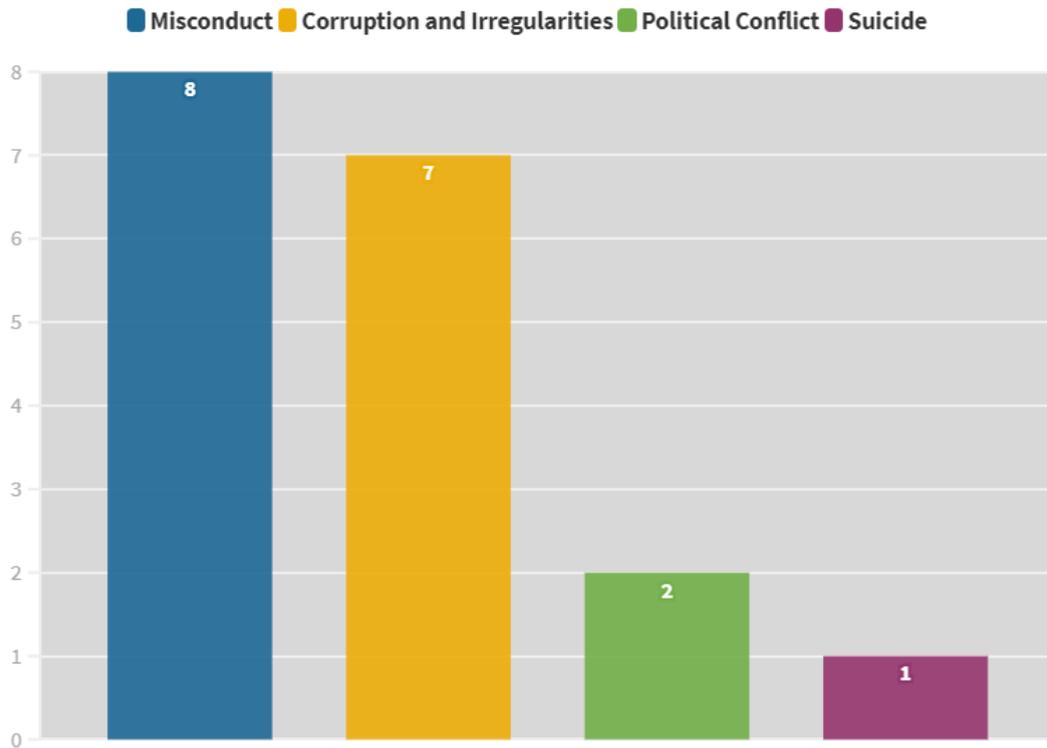
Vocational Positions of Complainants



Halk TV

14 content removal orders were placed against Halk TV, the online website of the official television channel of the Republican People's Party (CHP), the main opposition party in Turkey. The list included 8 orders targeting news reports on '*misconduct*' and 7 orders to take down content on '*corruption and irregularities*'. Furthermore, four news reports covered allegations of both '*corruption and irregularities*' and '*misconduct*.' The removal requests against these four news articles were placed by **senior bureaucrats** (2 items), **ministers** (1 item), and **business people** (1 item).

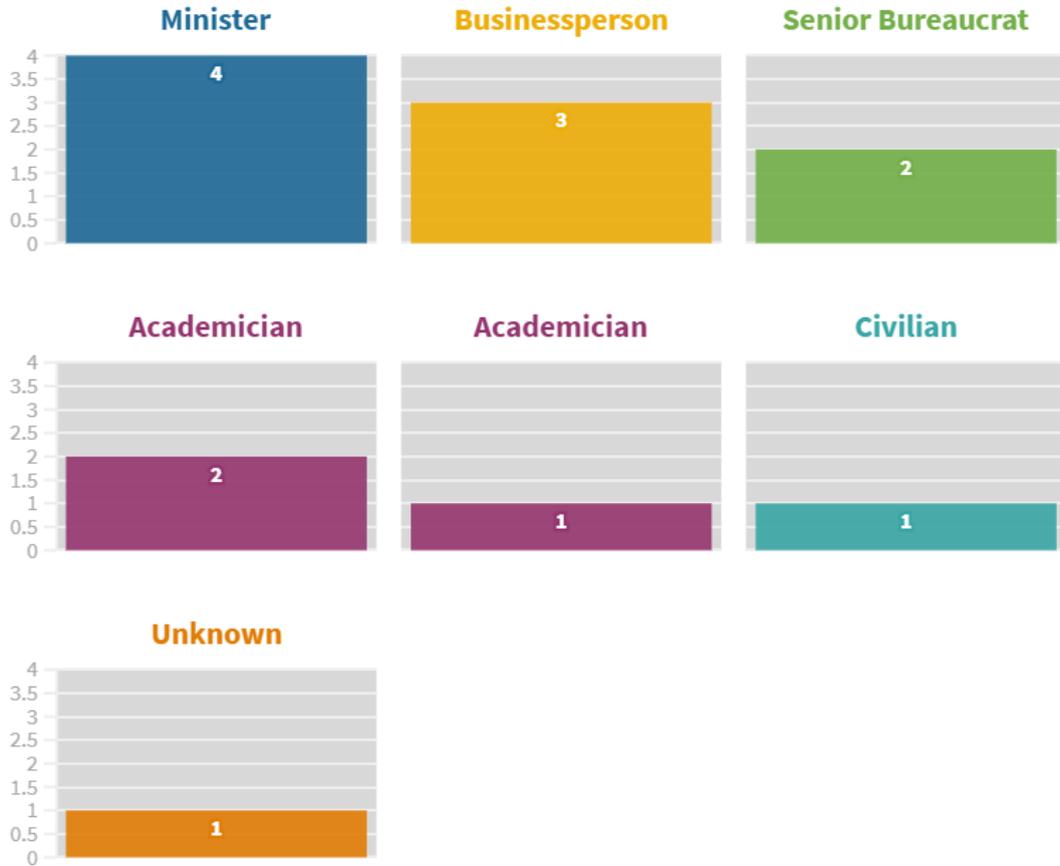
Distribution of News Topics Requested to be Taken Down



13 out of 14 takedown requests cited ‘*violation of personal rights*’. The complainants include: **ministers** (4 items), **business people** (3 items), and **academics** (2 items).

Particularly the news reports on ‘*misconduct*’ were targeted by **academics** (2 items), **ministers** (2 items), and **senior bureaucrats** (2 items). Furthermore, the majority of the requests to remove content on ‘*corruption and irregularities*’ came from **business people** (3 items) and **senior bureaucrats** (2 items).

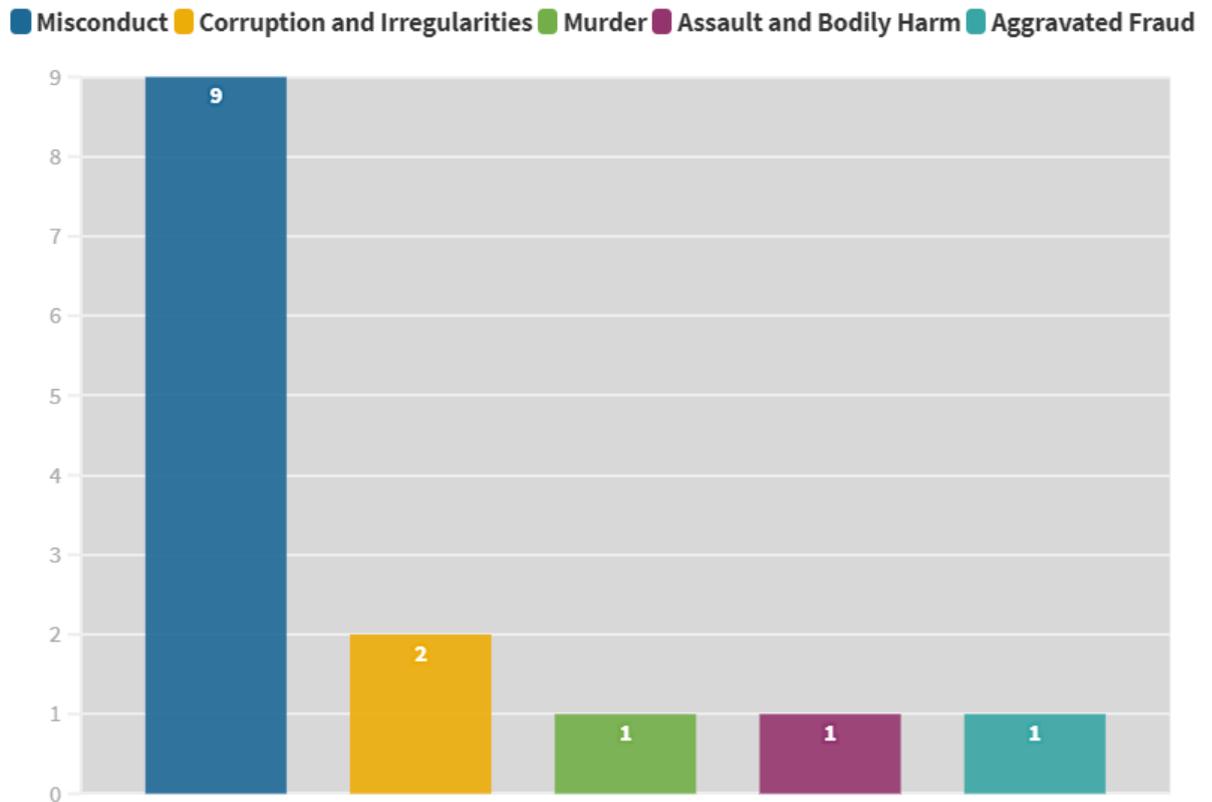
Vocational Positions of Complainants



Sputnik Turkey

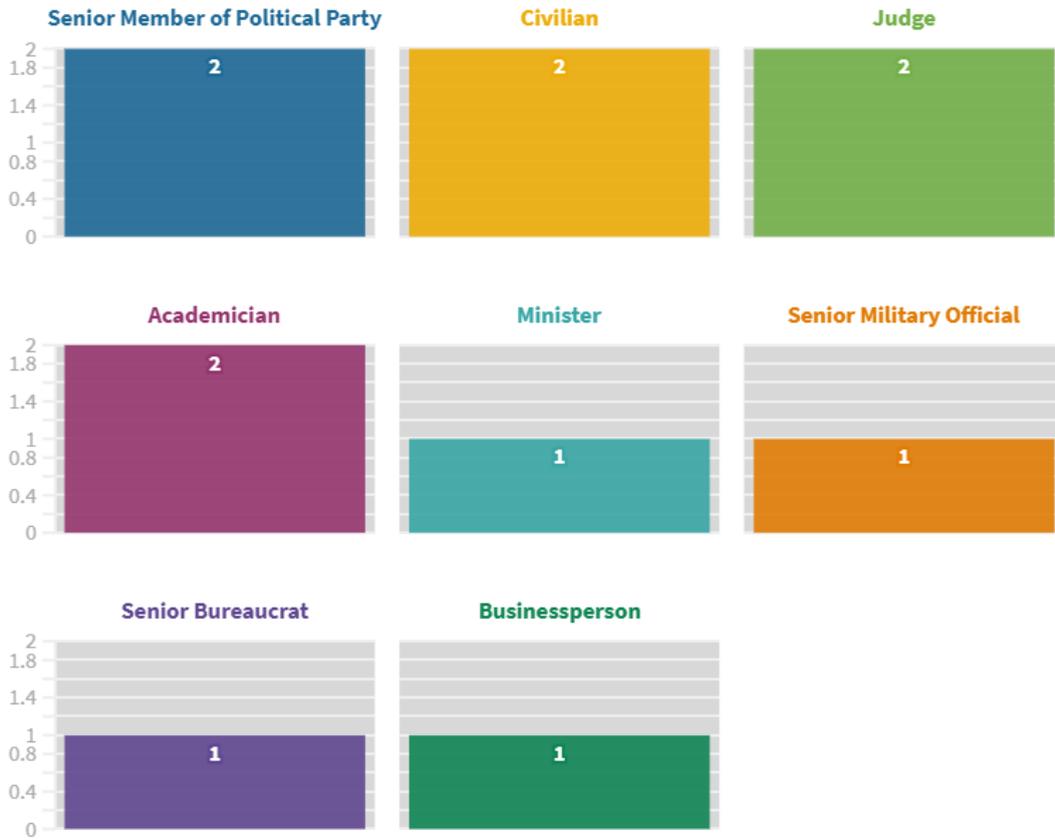
Sputnik Turkey, Turkish language service of the Russian Sputnik news agency, received 12 content removal requests. 9 requests were placed against news reports citing *'misconduct'* and 2 complaints were filed to remove content on *'corruption and irregularities'*. Two news reports reported on both offenses.

Distribution of News Topics Requested to be Taken Down



11 out of 12 takedown orders were based on ‘*violation of personal rights*’. The majority of the complainants were **senior members of political parties** (2 items), **civilians** (2 items), **judges** (2 items), and **academics** (2 items).

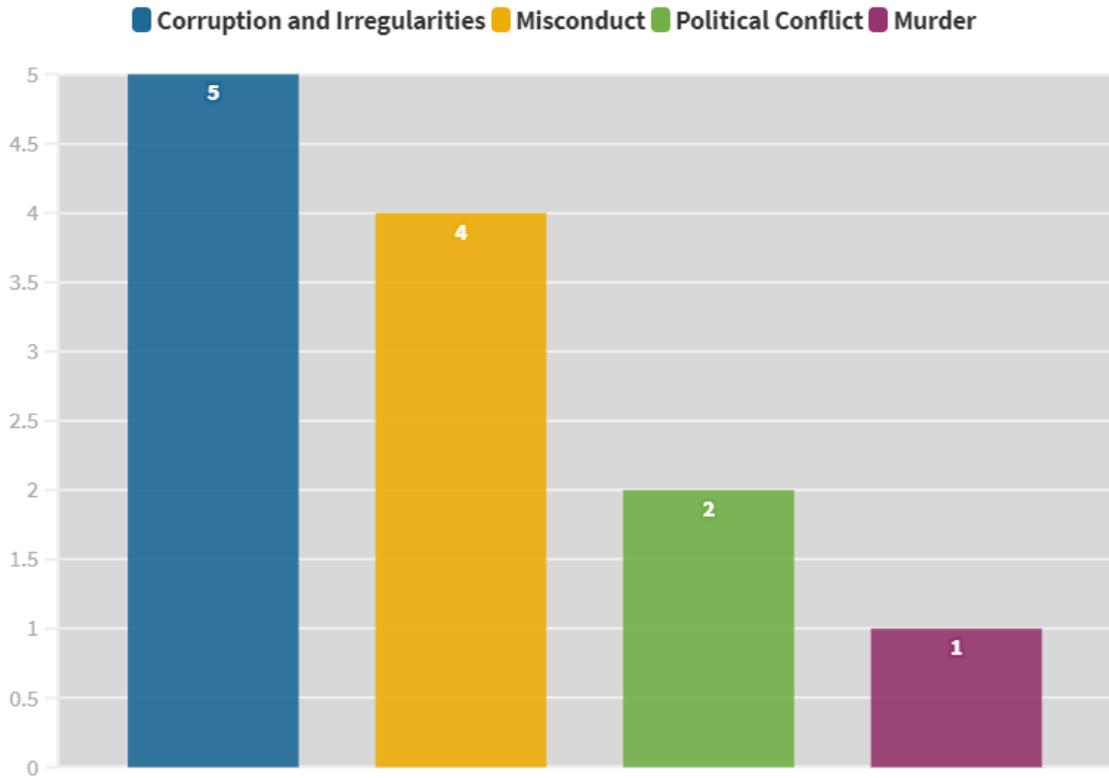
Vocational Positions of Complainants



Yurt Newspaper

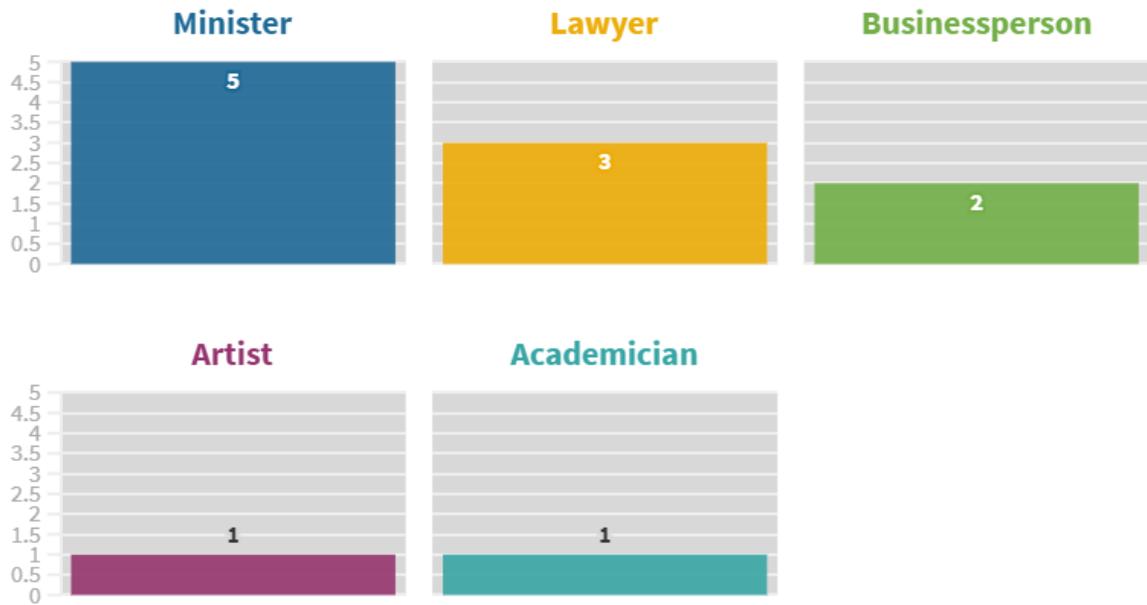
12 takedown orders were placed against the online news portal of Yurt daily. 5 of these news reports were about *'corruption and irregularities'* and 4 were reports of *'misconduct'*. Both offenses were mentioned in one news report. The majority of the complainants who targeted content on *'corruption and irregularities'* (2 items), *'misconduct'* (2 items) and *'political conflict'* (2 items) were **ministers**.

Distribution of News Topics Requested to be Taken Down



All of the 12 content removal requests were based on ‘*violation of personal rights*’. In fact, the majority of the individuals who filed complaint against Yurt were **ministers** (5 items), and **lawyers** (3 items).

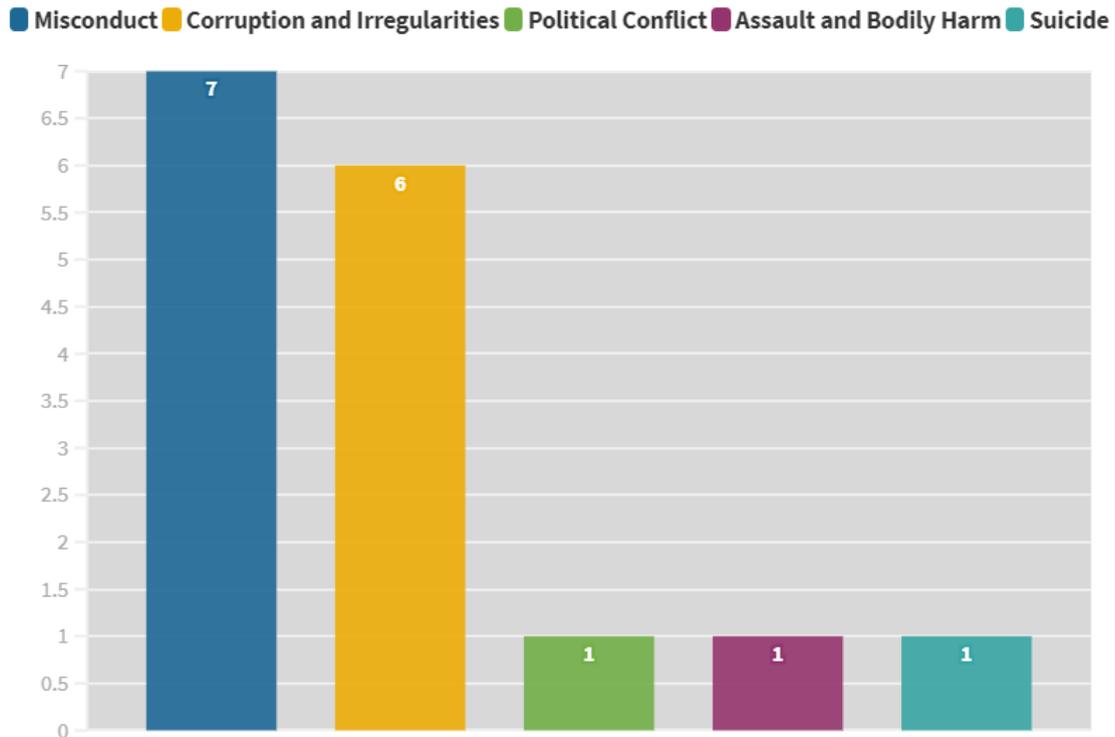
Vocational Positions of Complainants



Karar Daily

There were 11 takedown orders issued against the news reports published on the website of Karar, a daily newspaper. 7 of these news reports were about 'misconduct' and 6 articles reported allegations of 'corruption and irregularities'.

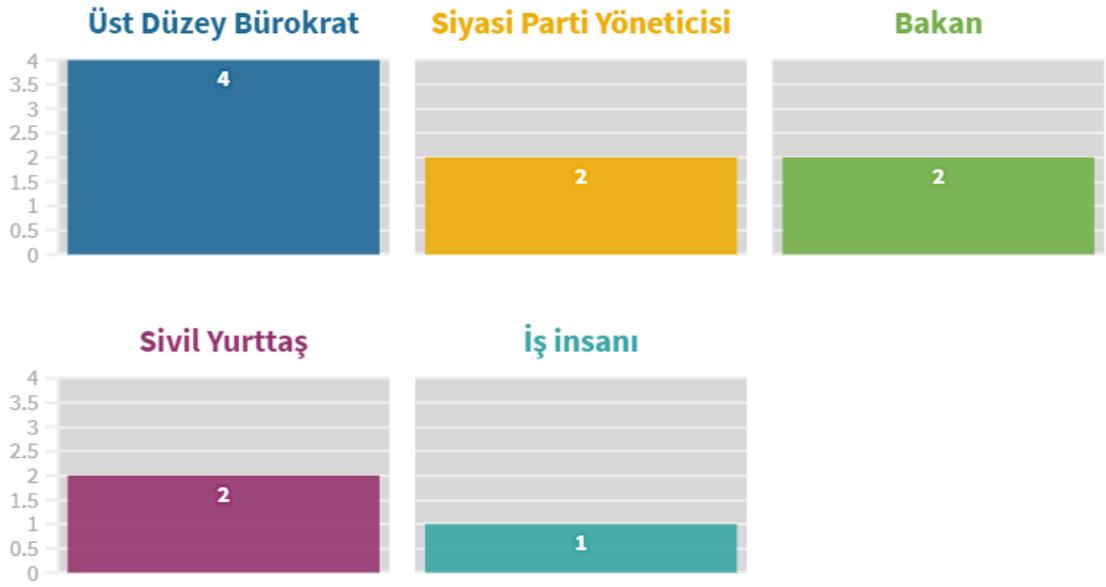
Distribution of News Topics Requested to be Taken Down



The majority of the content removal requests placed against Karar were based on ‘*violation of personal rights*’ (6 items), ‘*violation of presumption of innocence*’ (4 items), and ‘*right to be forgotten*’ (4 items). Furthermore, all requests based on ‘*violation of presumption of innocence*’ also cited the ‘*right to be forgotten*’, and all of these requests were placed by **senior bureaucrats**.

Likewise, the majority of the complainants against Karar were **senior bureaucrats** (4 items). Furthermore, the majority of the alleged perpetrators in news reports on ‘*corruption and irregularities*’ (4 items) and ‘*misconduct*’ (4 items) were also **senior bureaucrats**. Other complainants include **ministers** (2 items) and **senior members of political parties** (2 items).

Vocational Positions of Complainants

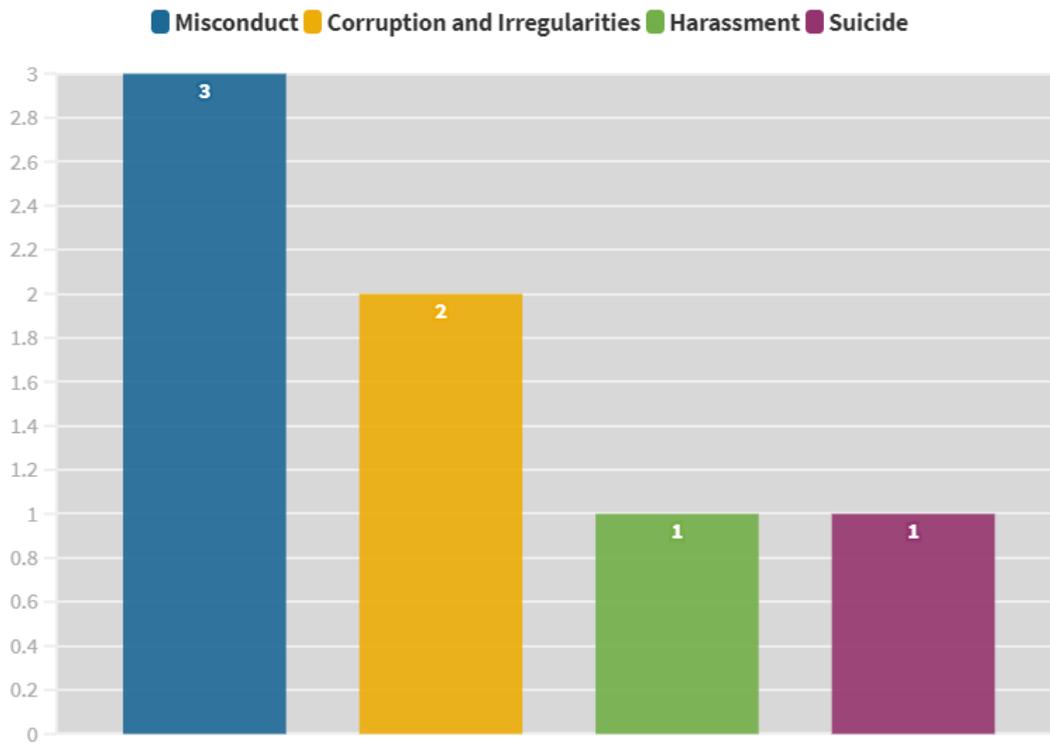


There were five news items in total which reported on both ‘*corruption and irregularities*’ and ‘*misconduct*.’ In this cluster, the majority of the complainants were **senior bureaucrats** (4 items).

Gazete Yolculuk

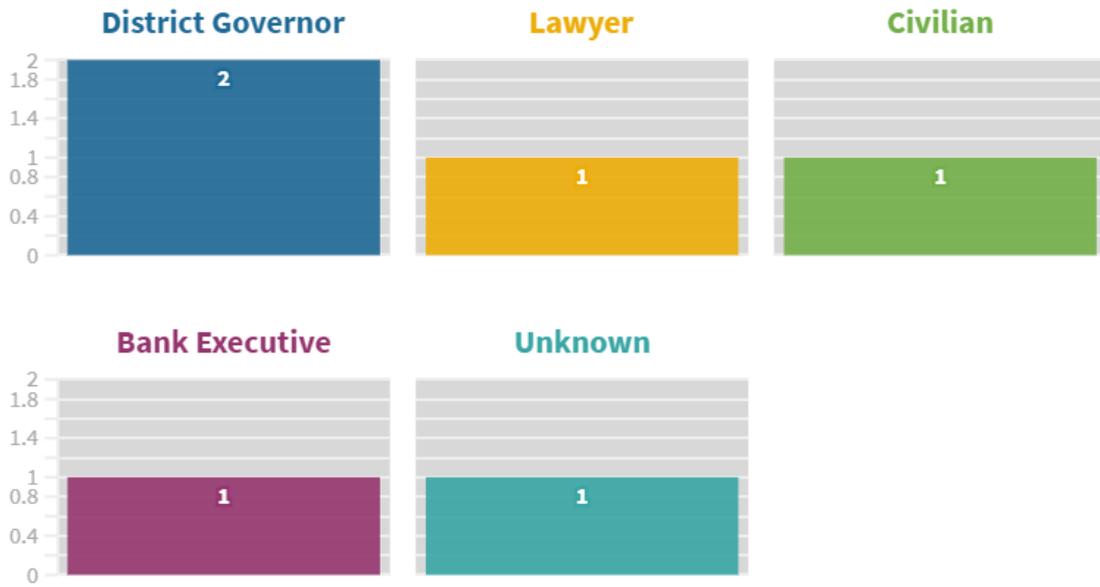
Gazete Yolculuk, an online news platform, received six content removal requests. These requests mainly targeted news content on actions involving ‘*misconduct*’ (3 items) and ‘*corruption and irregularities*’ (2 items). The majority of content removal requests against Yolculuk were placed by **district governors** (2 items).

Distribution of News Topics Requested to be Taken Down



Furthermore, all of the takedown requests submitted against Gazete Yolculuk were based on '*violation of personal rights*', and the majority of the alleged perpetrators in these news reports were **district governors** (2 items).

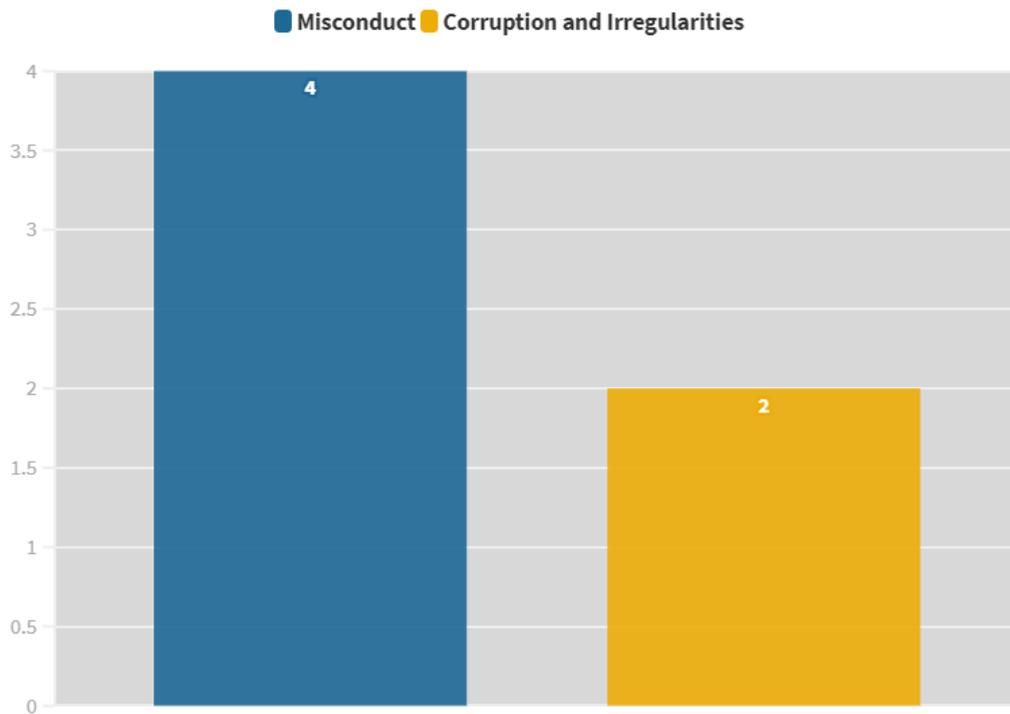
Vocational Positions of Complainants



Tükenmez Haber

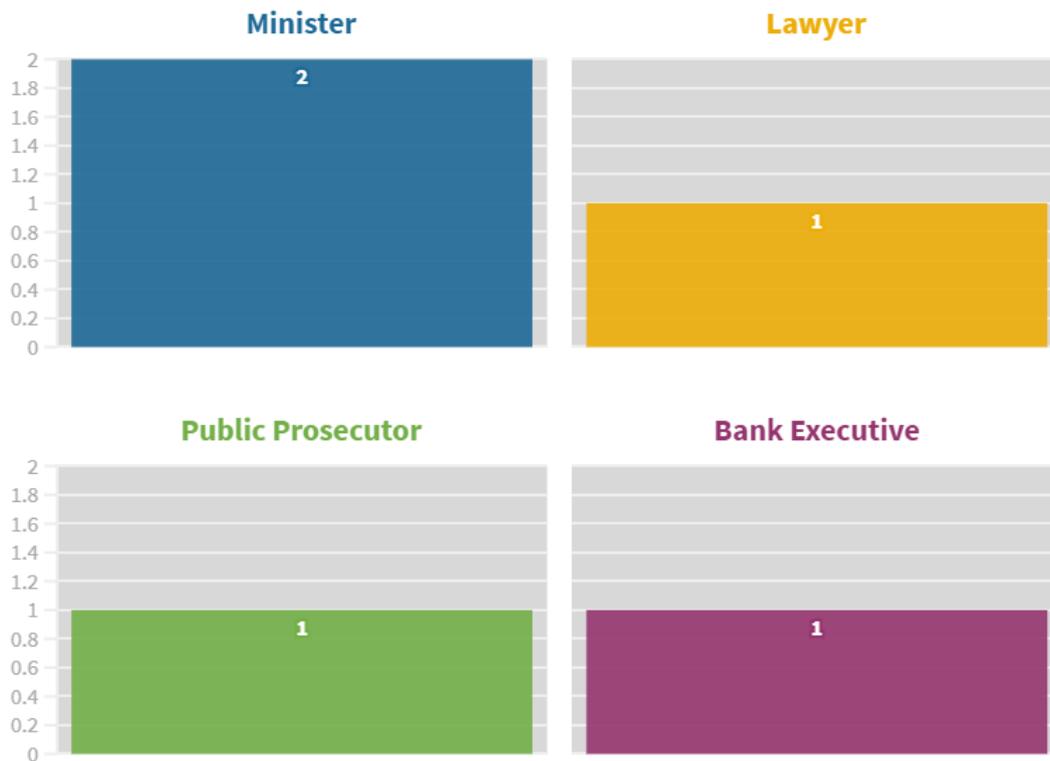
5 content removal requests were submitted against Tükenmez Haber, an online news outlet. The majority of these requests were placed to remove content on ‘*corruption and irregularities*’ (4 articles). The list also included two news items on ‘*misconduct*’ as well as one news article which reported on both ‘*corruption and irregularities*’ and ‘*misconduct*’.

Distribution of News Topics Requested to be Taken Down



All of the takedown orders sent to Tükenmez Haber were based on ‘*violation of personal rights*’. The majority of the complainants were **ministers** (2 items).

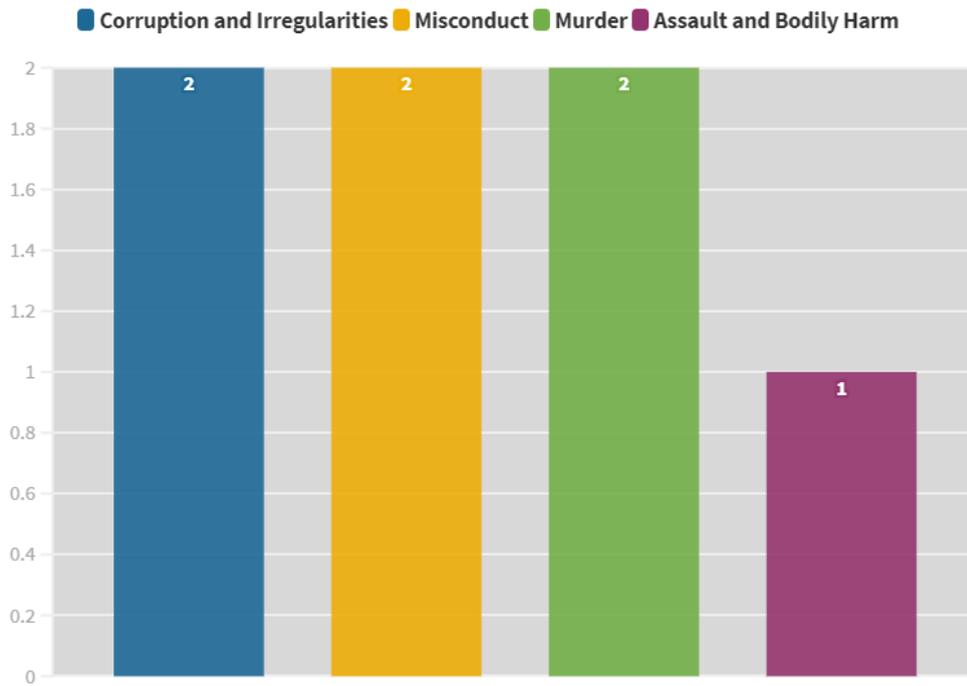
Vocational Positions of Complainants



Gazete Kolektif

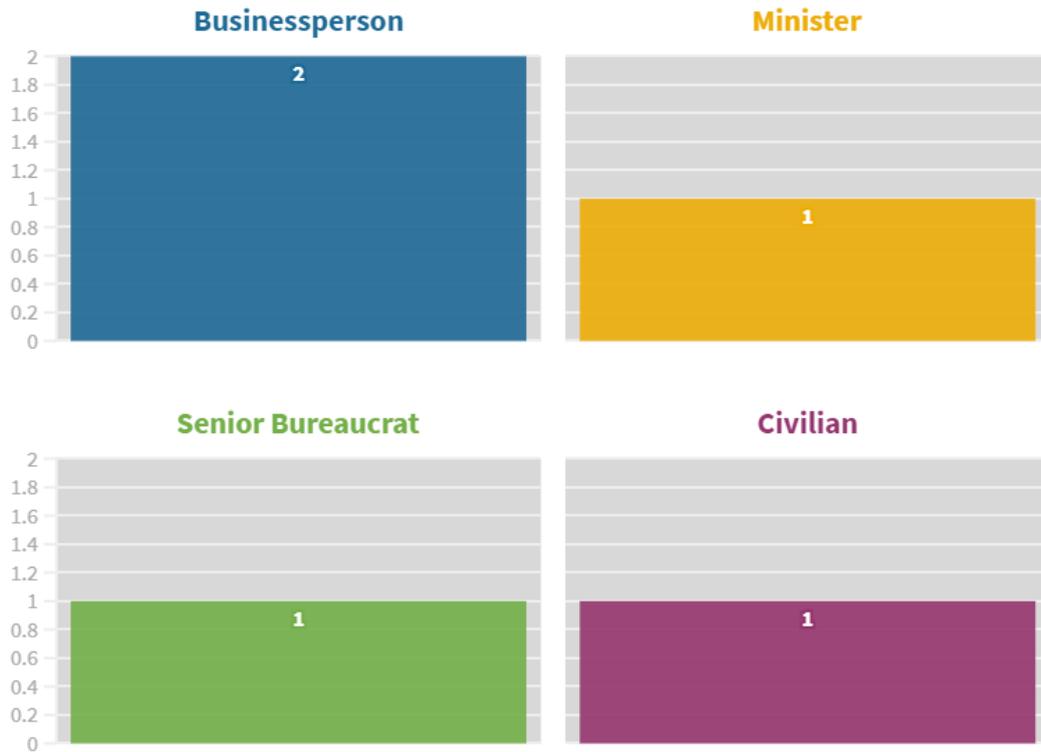
Five content removal requests were placed against Gazete Kolektif, an online news platform. Two out of five news items reported on both ‘*corruption and irregularities*’ and ‘*misconduct.*’ Besides, two broadcast bans were imposed on two news reports on ‘*murder*’ upon the requests of **business people**.

Distribution of News Topics Requested to be Taken Down



The majority of the complainants who cited '*violation of personal rights*' were also **business people** (2 items). It should also be noted that the majority of the content removal requests against Gazete Kolektif came from **business people** (2 items).

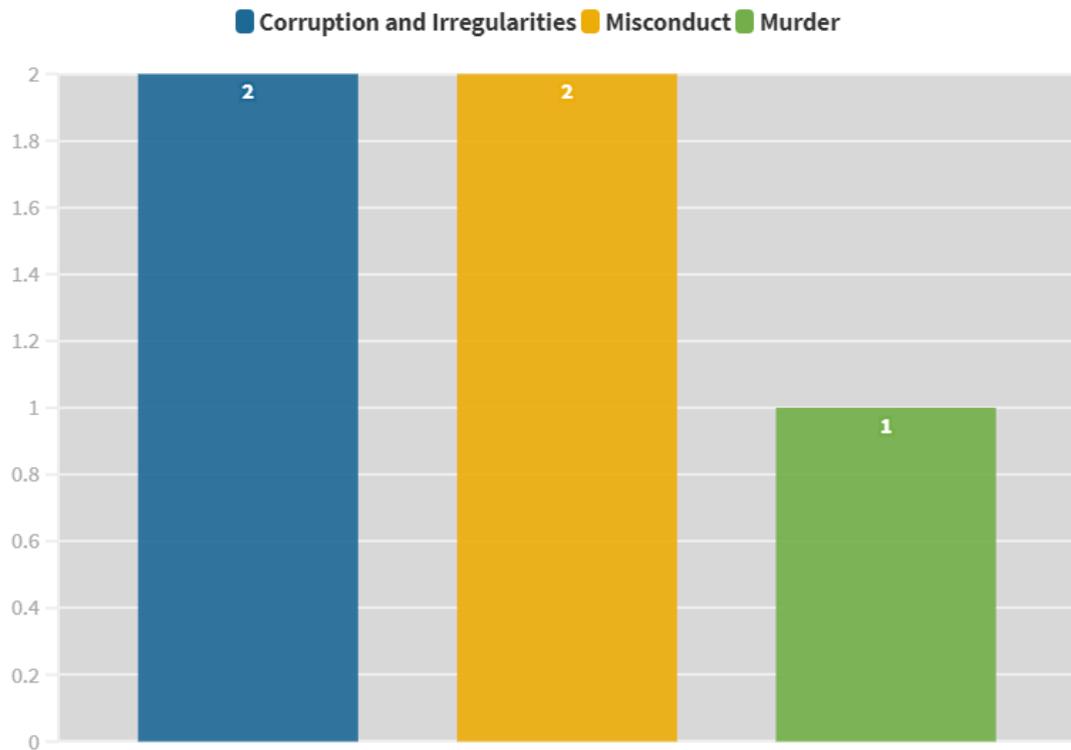
Vocational Positions of Complainants



Bianet

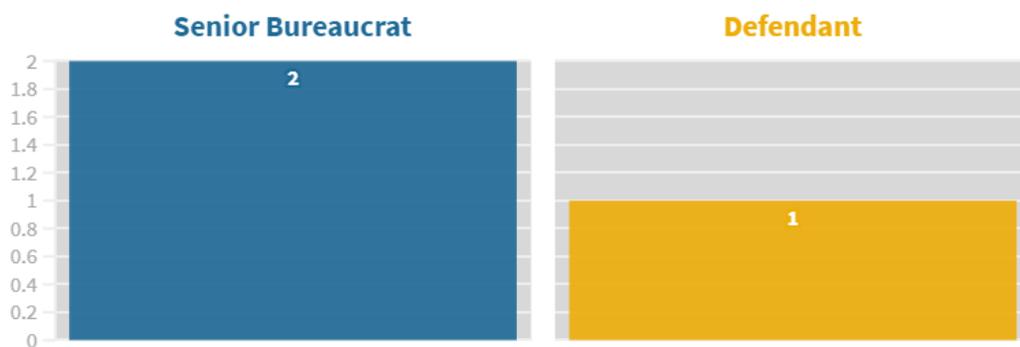
There were three takedown orders placed against Bianet, an independent online news platform. The list included two news articles reporting on both '*corruption and irregularities*' and '*misconduct*', in which the alleged perpetrators were **senior bureaucrats**.

Distribution of News Topics Requested to be Taken Down



The majority of these content removal orders were based on ‘*violation of personal rights*’ (2 items). It should also be noted that the majority of the complainants targeting Bianet were also **senior bureaucrats** (2 items).

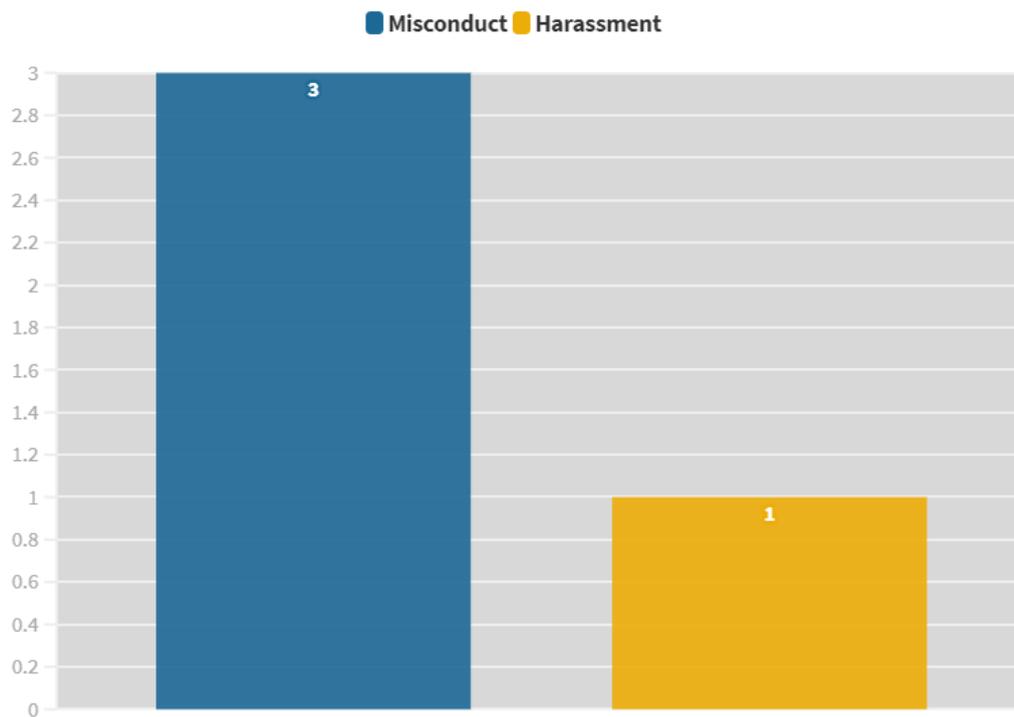
Vocational Positions of Complainants



Sendika.org

There were three takedown orders placed against Sendika.org, an online news platform. All of these news articles were reports of *'misconduct'* and the takedown requests targeting this content were based on *'violation of personal rights'*. The positions of the complainants were unknown.

Distribution of News Topics Requested to be Taken Down



Umut Gazetesi

Two content removal orders were placed against Umut Gazetesi, an online news platform. One of these news articles was a report of *'corruption and irregularities'*, while the other article covered allegations of both *'corruption and irregularities'* and *'misconduct'*. The individuals who placed takedown requests against Umut Gazetesi were **ministers** (1) and **bank executives** (1 item). Both of the content removal requests were based on *'violation of personal rights'*.

DW Turkey

There were two takedown orders placed against Deutsche Welle Turkey (DW Turkey), the Turkish-language website of Germany's international broadcaster of news. These news reports cited allegations of '*corruption and irregularities*' and both takedown requests were based on '*violation of personal rights*'. One of the complainants was a **minister**; however, the position of the other complainant is unknown.

Yeni Yaşam

Authorities placed 2 content removal requests against Yeni Yaşam, an online news platform. One of these news reports was about a **senior member of political party**, and the theme was '*misconduct*', while the other news article, which involved a **senior bureaucrat**, reported acts of '*corruption and irregularities*' and '*misconduct*'. Both takedown requests were based on '*violation of personal rights*'.

Gazete Fersude

Two content removal orders were placed against Gazete Fersude, an online news platform. These requests came from a **minister** (1 item) and a **senior bureaucrat** (1 item), and both news articles described allegations of both '*misconduct*' and '*corruption and irregularities*'. The takedown requests were based on '*violation of personal rights*' (1 item) and '*violation of presumption of innocence*' (1 item).

P24

Two content removal orders were placed against P24, a platform for independent journalism. One of the news reports in question cited allegations involving '*corruption and irregularities*' as well as '*misconduct*', and was taken to court by a **prosecutor**. Another news report involving a **deputy governor** cited allegations of '*misconduct*'. All of the takedown orders were based on '*violation of personal rights*'.

Medyascope

One content removal request was submitted against Medyascope, an independent news platform that broadcasts online audiovisual content. Authorities demanded the removal of a news reports on '*corruption and irregularities*' which involved a **minister**. The order was based on '*violation of personal rights*'.

Fox TV

There was one takedown order placed against a news report published by the official website of Fox television channel. The news article described allegations of '*misconduct*' by a **senior bureaucrat**. The content removal request was based on '*violation of presumption of innocence*'.

Yeni1Mecra

One content removal request was submitted against Yeni1Mecra, an independent news platform. The news report in question was about '*misconduct*' by a **senior bureaucrat**. The request was based on '*violation of presumption of innocence*'.

140Journos

One content removal request was placed against 140Journos, a new media publisher producing original documentary videos, research and visual stories. The news report described allegations of '*misconduct*' by a **senior member of a political party**. The request was based on the '*right to be forgotten*'.

BBC Türkçe

There was one takedown order placed against a news report on '*assault and bodily injury*' published by BBC Türkçe, the Turkish language service of BBC, Britain's state-owned broadcasting company. However, the perpetrator of the assault was not identified in the news report.

CONCLUSION

In the scope of the **Research to Monitor the Impact of the Social Media Law on Press Freedom**, we classified 658 content removal requests submitted to 35 media outlets from October 2020, the execution date of the Social Media Law, to April 2021.

By means of this classification, we created a comprehensive analysis method to identify the publishers and the themes of the news articles, the justifications for takedown requests and the positions of actors/complainants. As a result of this analysis, we reached the findings listed below:

- Cumhuriyet newspaper (80 items), BirGün Daily (68 items) and ODA TV (52 items) received the highest number of takedown requests among the media outlets covered by this research.
- The majority of content removal requests were placed by **business people** (103 items), followed by ministers (85 items) and lawyers (70 items).
- An analysis of the themes of these news reports reveal that the majority of the takedown orders were placed against content on '*corruption and irregularities*' (336 items) and '*misconduct*' (308 items). Besides, there were 114 news reports which reported on both offenses. The majority of the complainants against content on '*corruption and irregularities*' were **business people** (69 items) while most of the takedown orders against content on '*misconduct*' came from **senior bureaucrats** (45 items) and **ministers** (44 items).
- According to data, 580 out of 658 takedown orders were based on '*violation of personal rights*'. Other common justifications mentioned in takedown orders include '*absence of public interest*' (42 items) and '*privacy*' (40 items). The majority of the complainants who cited '*violation of personal rights*' were **business people** (102 items), while the complainants who cited '*absence of public interest*' were **lawyers** (23 items). Most of the requests based on '*privacy*' were placed by **civilians** (21 items).

- The complaints placed by **ministers** (85 items) mainly targeted content on '*misconduct*' (44 items), '*corruption and irregularities*' (40 items), and '*political conflict*' (30 items). All of the content removal requests placed by **ministers** (85 items) were approved on the basis of '*violation of personal rights*'. The publishers of the news reports targeted by **ministers** can be listed as follows: Cumhuriyet (9 items), TELE1 (8 items), SoL (6 items), T24 (5 items), Artı Gerçek (5 items).
- Among the news content involving **senior bureaucrats** (66 items), 65 news reports described allegations of '*corruption and irregularities*', while 45 news reports were about '*misconduct*'. The majority of the content removal requests were based on '*violation of personal rights*' (41 items). Furthermore, the '*right to be forgotten*' (25 items) and '*violation of presumption of innocence*' (25 items) were cited concurrently in the other takedown orders. The distribution of content removal requests placed by **senior bureaucrats** against publishers is as follows: Cumhuriyet (10 items), BirGün (6 items), SoL (5 items), Sözcü (5 items), İleri Haber (5 items), Evrensel (4 items).
- According to the research findings, **mayors** filed 19 content removal requests, 17 of which were reports of '*misconduct*'. Furthermore, 13 news reports cited allegations of '*corruption and irregularities*'. All of the takedown orders placed by **mayors** were based on '*violation of personal rights*'. The content removal requests placed by **mayors** targeted the following media outlets: ODA TV (12 items), SoL (2 items), BirGün (2 items), Sözcü (1 item), Cumhuriyet (1 item).
- It should also be noted that **former mayors** also submitted 3 content removal requests, all of which targeted news content on '*corruption and irregularities*'. All of these orders were based on '*violation of personal rights*'. The distribution of

these content removal requests placed by **former mayors** is as follows: dokuz8HABER (1 item), Yeniçağ (1 item), Sözcü (1 item).

- The news items which were taken to court by **prosecutors** (16 items) were primarily reports of '*corruption and irregularities*' (13 items), followed by content on 'misconduct' (9 items). Furthermore, 6 news items cited both offenses. The most commonly used justification for these takedown orders was the '*violation of personal rights*' (16 items). The distribution of the content removal requests placed by **prosecutors** is as follows: Cumhuriyet (3 items), BirGün (3 items), Gerçek Gündem (2 items), ODA TV (2 items), İleri Haber (2 items).
- **District governors** were the primary perpetrators in 15 news reports, and all of the content removal requests placed by **district governors** targeted reports of '*misconduct*'. All of these requests were based on '*violation of personal rights*' (15 items). The distribution of the content removal requests placed by **district governors** is as follows: T24 (2 items), İleri Haber (2 items), Gazete Yolculuk (2 items), Cumhuriyet (2 items), SoL (2 items).
- In the scope of this research, 15 takedown orders placed by **judges** were identified. The theme of all of the news reports targeted by these orders was '*misconduct*'. Furthermore, there were 3 news articles which covered both '*corruption and irregularities*' and '*misconduct*.' All of the content removal requests were based on '*violation of personal rights*'. The distribution of the content removal requests placed by **judges** is as follows: dokuz8HABER (3 items), Cumhuriyet (3 items), Sputnik Turkey (2 items), Sözcü (2 items), Evrensel (2 items), T24 (2 items).

- A review of the content removal requests placed by **members of the parliament** (12 items) revealed that this group particularly targeted content on '*corruption and irregularities*' (10 items) and '*misconduct*' (5 items). Both offenses were cited in three news reports. All of these content removal requests were based on '*violation of personal rights*'. The distribution of content removal requests placed by **members of the parliament** against publishers is as follows: Cumhuriyet (5 items), Evrensel (2 items), BirGün (1 item), ODA TV (1 item), T24 (1 item), Sözcü (1 item), Gazete Manifesto (1 item).
- All of the news reports that were taken to court by **senior military officials** (10 items) were reports of '*misconduct*'. The majority of these takedown orders were based on '*violation of personal rights*' (10 items), while eight orders cited both '*violation of personal rights*' and the '*right to be forgotten*'. The distribution of the takedown requests by **senior military officials** is as follows: BirGün (2 items), ODA TV (1 item), T24 (1 item), Cumhuriyet (1 item), Sputnik Türkiye (1 item).
- All of the content removal requests placed by **civil servants** (3 item) targeted news content on '*misconduct*', and these requests were approved by courts on the basis of '*violation of personal rights*'. The distribution of these takedown orders is as follows: BirGün (2 items), SoL (1 item).
- According to the research findings, **deputy governors** placed 7 content removal requests, including 6 requests to remove content on '*misconduct*' and one request to take down an article reporting '*corruption and irregularities*'. All of these applications were approved on the basis of '*violation of personal rights*'. The distribution of the content removal requests placed by **deputy governors** is as follows: Cumhuriyet (2 items), P24 (1 item), BirGün (1 item), Sözcü (1 item), Artı Gerçek (1 item).

- **Business people** (103 items) was the group to place the highest number of takedown requests during the research period. The majority of the content targeted by business people were reports of *'corruption and irregularities'* (69 items), followed by *'misconduct'* (26 items) and *'murder'* (16 items). 102 out of 103 news reports were taken to court by business people on the basis of *'violation of personal rights'*. The distribution of content removal requests filed by **business people** is as follows: Cumhuriyet (12 items), T24 (12 items), Yeniçağ (11 items), BirGün (9 items), Gerçek Gündem (9 items), dokuz8HABER (8 items), TELE1 (7 items), İleri Haber (5 items).
- **Lawyers** submitted 70 content removal requests, including 47 news articles on *'corruption and irregularities'* and 24 on *'misconduct'*. All of the requests were approved on the basis of *'violation of personal rights'*. Furthermore, 23 applications cited both *'violation of personal rights'* and *'absence of public interest'*. The distribution of content removal requests submitted by **lawyers** is as follows: SoL (8 items), BirGün (8 items), Cumhuriyet (7 items), Gerçek Gündem (6 items), TELE1 (5 items).
- **Civilians** (40 items) mostly filed applications take down news content on *'assault and bodily harm'* (20 items) and *'suicide'* (11 items). The most commonly cited justifications by civilians include *'privacy'* (21 items) and *'violation of personal rights'* (17 items). The distribution of the takedown requests filed by **civilians** is as follows: ODA TV (5 items), Sözcü (4 items), dokuz8HABER (4 items), BirGün (3 items), T24 (3 items).
- According to research findings, **senior members of political parties** (37 items) primarily targeted news content on *'misconduct'* (33 items). Besides, there were

six news reports covering allegations of ‘*misconduct*’ and ‘*harassment*’. The majority of the content removal requests were based on ‘*violation of personal rights*’ (36 items). The second most cited justification was ‘*privacy*’ (19 items), and in all instances, ‘*privacy*’ was mentioned together with ‘*violation of personal rights*’. The distribution of the content removal requests filed by **senior members of political parties** can be summarized as follows: Sözcü (6 items), Cumhuriyet (5 items), Evrensel (4 items), Yeniçağ (4 items), dokuz8HABER (4 items).

- **Academics** were identified as perpetrators in 36 news reports that were targeted by content removal requests, including 26 articles on ‘*misconduct*’ and 9 news reports on ‘*murder*’. All of the requests submitted by academics were approved by courts on the basis of ‘*violation of personal rights*’. The distribution of these requests across media outlets is as follows: BirGün (6 items), T24 (4 items), Cumhuriyet (4 items), ODA TV (3 items), Sözcü (3 items).
- **Bank executives** (12 items) mostly featured in news reports describing ‘*corruption and irregularities*’, and all of the takedown requests submitted by this group were approved on the basis of ‘*violation of personal rights*’. The content removal requests placed by **bank executives** targeted the following media outlets: ODA TV (1 item), Umut Gazetesi (1 item), TELE1 (1 item), Artı Gerçek (1 item), Gerçek Gündem (1 item).
- Nine content removal requests were submitted by **artists**, who mainly targeted news content on ‘*gambling*’ (9 items). The applications filed by this group were turned into broadcast bans due to ‘*violation of personal rights*’. The distribution of the content removal requests placed by **artists** is as follows: TELE1 (1 item), Sözcü (1 item), BirGün (1 item), Cumhuriyet (1 item), T24 (1 item).

- Similarly, all of the news articles taken to court by **defendants** of ongoing court cases (8 items) were reports of ‘*murder*’, and all of these requests were accepted on the basis of the ‘*right to be forgotten*’. The distribution of these requests across media outlets is as follows: Cumhuriyet (4 items), Yeniçağ (1 item), T24 (1 item), BirGün (1 item), Bianet (1 item).
- All of the content removal requests filed by **athletes** (4 items) were reports of ‘*corruption and irregularities*’ and ‘*misconduct*’. Besides, these requests were approved on the basis of ‘*violation of personal rights*’. Furthermore, all of these requests targeted the content published by BirGün daily.
- **Universities** (2 items), which are legal entities, submitted content removal requests against news articles on ‘*misconduct*’ and ‘*corruption and irregularities*’. The courts approved takedown requests by these institutions on the grounds of ‘*violation of personal rights*’. Once again, all of these requests were filed to take down news content published by BirGün daily.
- **Businesses** (25 items), acting as legal entities, submitted 21 requests to take down news reports on ‘*corruption and irregularities*’, and 4 news reports on ‘*environmental damage*’. The majority of the content removal orders were based on ‘*damage to business reputation*’ (14 items). The distribution of content removal requests placed by **businesses** against media outlets is as follows: ODA TV (5 items), BirGün (5 items), dokuz8HABER (5 items), Evrensel (3 items), Cumhuriyet (2 items).

The **Research to Monitor the Impact of the Social Media Law on Press Freedom** demonstrates that in Turkey, law is being used as an instrument to block media coverage

about illegal acts of ‘privileged’ individuals,¹ although lawmakers have reassured the public that fundamental rights and freedoms would be protected. Therefore, there is a justifiable suspicion that the amendment of the law on regulation of publications on the internet and suppression of crimes committed by means of such publications, i.e., ‘Social Media Law’, is effectively being utilized to restrict citizens’ freedom to access news. A review of the content targeted by the authorities reveals that the majority of these news reports contain allegations of ‘*corruption and irregularities*’ or ‘*misconduct*’ or both.

This suspicion is further strengthened by the overall social positions of the complainants. As a matter of fact, the majority of the individuals who went to court to take down online content were **business people, ministers** or **senior bureaucrats**, while the number **civilians** among the complainants is minimal.

- The ‘Social Media Law’ was drafted with authorities’ assurances that the basic rights and freedoms and public benefit would be held above anything else. However, findings of this research demonstrate that the legislation and resulting sanctions may lead to negative consequences in terms of freedom of expression and communication. In this framework, the Social Media Law should be revised with a stronger focus on the benefits of all affected parties. In this legislative process, the lawmakers should follow the steps described below:

⇒ When introducing new legislation on digital rights and freedoms, authorities should create advisory boards to bring together all affected parties (including representatives of the industry, media outlets, academics, lawyers, legal advisors, civil society organizations and activists) and to initiate a comprehensive, open deliberation process.

⇒ In the revision process, independent auditing bodies should be created to analyze the impact of the Social Media Law. The multidimensional effects

¹ Statement on ‘social media law’ by Ünal from AK Party, 01/10/2020 See <https://www.milliyet.com.tr/siyaset/ak-partili-unaldan-sosyal-medya-yasasi-aciklamasi-6319526>

of the resulting sanctions should be investigated to gather tangible data to lay a basis for the legislative process.

⇒ All sectors of the society should be included in the legislative process via advisory boards and auditing bodies, and the Social Media Law should be collectively revised to make sure it effectively guarantees fundamental rights and freedoms.

- In a legal system that upholds democracy and basic rights and freedoms, the legislative process as well as the legal practices to be introduced by law must be based on the same ground. In this regard, all judicial processes introduced by the amendment of the law on regulation of publications on the internet and suppression of crimes committed by means of such publications should be revised on the basis of freedom of communication and freedom to access information. Similarly, the legal sanctions to be implemented in the scope of this law should be based on a rights-based approach that focuses on public benefit and that prioritizes social progress.
- Public scrutiny, supported by press and civil society, plays a vital role in protection of democracy and fundamental rights and freedoms. Therefore, the sanctions implemented under the “amendment of the law on regulation of publications on the internet and suppression of crimes committed by means of such publications” must be overseen not only by media outlets, civil society organizations and experts who specialize in digital rights and freedoms but also by all stakeholders in the press and civil society sectors that uphold freedom of press and freedom of expression. Therefore, professional associations, trade unions, news outlets, media organizations and civil society organizations should launch campaigns to raise awareness on basic rights and the sanctions brought by the legislation. Furthermore, they should inform decision-makers and the public on the impact of this legislative process.

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