

## NEW OBLIGATIONS CONCERNING SOCIAL MEDIA PLATFORMS AND GAMING PLATFORMS (The Social Media Ban for Children and Other Measures)

The Law on Amendments to the Social Services Law and Certain Other Laws No. 7578 (“Amendment Law”), which introduces amendments to several regulations—primarily the Law No. 5651 on the Regulation of Publications on the Internet and Combating Crimes Committed Through Such Publications (“Internet Law”)—with the aim of protecting children in digital environments, particularly on social media platforms and gaming platforms, was published in the Official Gazette on May 1, 2026.

So, what are the key highlights of the Amendment Law? What new obligations have been introduced for social media platforms and gaming platforms, and what administrative sanctions may be imposed in the event of non-compliance with these obligations?

### Date of Entry into Force

These new provisions governing social media platforms and gaming platforms will enter into force six months following their publication in the Official Gazette, i.e., on November 1, 2026.

### Key Regulatory Provisions Introduced by the Amendment Law for Social Media Platforms and Gaming Platforms:

Social Media Ban for Users Under 15 Years of Age

Mandatory Age-Appropriate Rating and Classification of Games

Obligation to Develop and Implement Parental Control Tools

Requirement for Foreign Gaming Platforms to Appoint a “Local Representative”

Compliance with Orders for Content Removal and/or Blocking of Access in Cases Requiring Urgent Intervention

Obligation to Respond to Information Requests Issued by the Information and Communication Technologies Authority (“ICTA”)

Risk of Administrative Sanctions

## MAIN OBLIGATIONS BASED ON AGE CRITERIA

## A Prohibition on Social Media Access for Individuals Under the Age of 15 Has Been Introduced

**Children under the age of 15** will be completely prohibited from accessing social media platforms. In this context, social network providers are required to take all necessary technical and administrative measures, including age verification mechanisms, in order to ensure the effective implementation of this prohibition.

In addition, social network providers will be required to publish on their own websites the measures they have taken both in relation to age verification and the provision of differentiated services.

**For children between the ages of 15 and 18**, access to social media platforms will not be subject to a complete ban. However, social network providers will be required to take the necessary measures to offer differentiated services tailored specifically to this age group.

## Mandatory Age-Appropriate Classification of Games Has Been Introduced

Gaming platforms (i.e., platforms that enable the distribution and/or play of digital games) will be required to classify games in accordance with established age criteria (for example, by applying age ratings such as 6+, 12+, 16+, and 18+). Games and/or content that are not properly age-rated may neither be offered to users nor maintained within their systems, and must be removed accordingly.



**Rule:** Games that have not been properly age-rated may be made available to users only on the condition that they are classified in accordance with the highest applicable age rating.

## OBLIGATIONS TO DEVELOP PARENTAL CONTROL TOOLS AND APPOINT LOCAL REPRESENTATIVE

### Obligation to Develop Parental Control Tools Has Been Introduced

**Social network providers** will be required to develop clear, comprehensible, and user-friendly parental control mechanisms that enable parents to (i) monitor and limit the amount of time their children spend on social media platforms, (ii) supervise account settings, and (iii) subject transactions such as purchases, rentals, or paid subscriptions to parental approval.

**Gaming platforms** will be required to develop clear, comprehensible, and user-friendly parental control tools that enable parents to (i) supervise account settings and (ii) subject fee-based transactions such as purchases, rentals, and paid subscriptions to parental consent or approval.

### Foreign Gaming Platforms Are Required to Appoint and Maintain a “Local Representative” in Türkiye

**Gaming Platforms:** Foreign-origin gaming platforms with more than one hundred thousand daily access from Türkiye will be required to appoint a natural or legal person as a local representative in Türkiye in order to ensure compliance with official notifications, communications, or requests issued by competent authorities, as well as the fulfilment of other obligations under the Internet Law. The details of such representative must be notified to the ICTA.

In addition, gaming platforms will be required to publish the contact information of their representatives on their websites in a manner that is easily visible and directly accessible to the public.

**Social Network Providers:** The requirement for foreign social media platforms with more than one million daily access from Türkiye to appoint and maintain a local representative in Türkiye already existed under the current legal framework. There is no change in this respect.

## FURTHER OBLIGATIONS IN THE CONTEXT OF RELATIONS WITH ICTA

### Obligation to Promptly Comply With Content Removal and/or Access Blocking Orders in Cases of Urgency or Risk of Harm is Identified Introduced

Social network providers with more than ten million daily access from Türkiye will be required to execute decisions issued under the Internet Law in cases deemed urgent or where delay may cause prejudice, **immediately and in any event within one hour at the latest**.

This obligation is not limited thereto; social network providers will be also required to take all necessary measures to ensure that the relevant content subject to removal or blocking decisions is not published on their own websites.

### Obligation to Comply With Information Requests Issued by the ICTA Introduced

ICTA will be able to request from gaming platforms explanations directly related to the implementation of the Internet Law, including but not limited to their corporate structure, IT systems, and data processing mechanisms.

Gaming platforms will be required to **promptly** provide the requested information and documents upon such request, **and in any event within a period not exceeding fifteen days**, or within such shorter period as may be determined by ICTA.

! All procedures and principles regarding compliance with these obligations by social media platforms and gaming platforms will be determined by a regulation to be issued by the ICTA.

## MAJOR SANCTION RISKS FOR SOCIAL MEDIA PLATFORMS

### BREACH

### SANCTION

1

Social network providers that fail to comply with their obligations to either refrain from providing services to children under the age of fifteen or to offer segregated services to children aged fifteen and above

Social network providers that fail to comply with information requests issued by ICTA,

Social network providers that fail to develop clear, comprehensible, and user-friendly parental control tools,

Social network providers that fail to take measures to prevent misleading advertisements

Social network providers with more than ten million daily access from Türkiye that fail to take the necessary measures to ensure that content subject to removal and/or access blocking orders issued under the Internet Law is not published on their own websites

may be subject to an administrative fine of **up to three percent of their global turnover** for the preceding calendar year.

2

If the relevant obligations are not fulfilled within thirty days following notification of the administrative fine

a ban may be imposed on Türkiye-resident taxpaying natural and legal persons from **placing new advertisements with the relevant social network providers, entering into new agreements for such purposes, and making any fund transfers** in this context.

3

Where the relevant obligations are not fulfilled within three months following the advertising ban decision and such non-compliance persists

a bandwidth throttling measure **reducing internet traffic by 50% to 90%** may be imposed on the relevant social network providers.

## MAJOR SANCTION RISKS FOR GAMING PLATFORMS

### BREACH

### SANCTION

failing to properly rate games in accordance with applicable procedures

failing to develop parental control tools

failing, in the case of foreign gaming platforms, to comply with the "local representative" requirement

failing to comply with ICTA's information requests

failing to fulfil other obligations set out in the regulation to be issued by ICTA

where gaming platforms are notified on these grounds and fail to remedy the notified breaches within thirty days of such notification

an administrative fine ranging from TRY 1,000,000 to TRY 10,000,000 (approx. from USD 22,110 to USD 221,110) may be imposed on the relevant gaming platforms.

Where the relevant obligation remains unfulfilled within thirty days of notification of the administrative fine

an additional administrative fine ranging from TRY 10,000,000 to TRY 30,000,000 (approx. from USD 221,110 to USD 663,410) may be imposed.

If the notified obligation is not fulfilled within thirty days following service of the second administrative fine

the internet traffic bandwidth of the gaming platforms may be reduced by 30%.

If the notified obligation is still not fulfilled within thirty days following the implementation of the bandwidth throttling measure

the internet traffic bandwidth of the gaming platforms may be further reduced by up to 50%.

Bu not hukuki görüş niteliğinde değildir. Sadece bilgi amaçlı hazırlanmış ve gönderilmiştir. Konuyla ilgili hukuki görüş almak isterseniz bizimle bağlantıya geçmenizi rica ederiz.

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