

## **Recent Amendments to the Internet Law numbered 5651 Concerning Social Media and Game Platforms**

Implementing legal limitations on the use of social media by children has been the topic of ongoing debate around the world for some time now. Law No. 5651 on the Regulation of Internet Broadcasts and Prevention of Crimes Committed through Such Broadcasts (the “Law No: 5651/ Internet Law”) contains many provisions regulating online services used by millions every day. The main objective of the Law was to stipulate quick and effective provisional measures against illegal content published online and establish related obligations of relevant actors. However, as more and more amendments came by, the scope of the law gradually widened to include various topics related to online world. The most recent of such amendments is the Law No. 7578 on Amendments to the Social Services Law and Certain Other Laws (“Law No. 7578”), published in the Official Gazette dated May 1<sup>st</sup>, 2026 and numbered 33240. The recent amendments not only brought into force the age limitation for social network providers but also established a whole new legal framework for “*game platforms*”. In particular, regulations have been introduced concerning the protection of children, content moderation, the regulation of platform liability, the tightening of administrative sanctions and interventions, and the obligation to appoint a local representative. Although the latest amendments introduce certain rules similar to those contained in the EU’s Digital Services Act, they appear to be more enforcement- and supervision-oriented compared to the EU framework

The new obligations and amended provisions are set to come into force on November 1<sup>st</sup>, 2026.

### **- New Obligations for Social Network Providers**

#### **Social Media Restrictions on Minors Under the Age of 15**

The additional Art. 4 of Internet Law is the main article containing the social media platform related provisions. With the new amendments, social network providers have been prohibited from offering their services to minors under the age of 15, effectively implementing the long-discussed “*social media ban*” on minors younger than 15.

The obligation of social network providers to implement measures necessary to accomplish the new prohibition, including age verification is regulated.

## **Parental Control**

Additionally, it's now necessary for social network providers to offer adequate parental controls and take measures against misleading advertisements.

Social network providers must provide clear, comprehensible, and user-friendly parental control tools. Such parental control tools shall include mechanisms relating to the control of account settings; making fee-based transactions, such as purchases, rentals, and paid subscriptions, subject to parental permission or approval; monitoring and limiting the duration of use.

## **New Time Limits to perform orders of authorities**

Furthermore, the time limit set for performing orders of urgent removal issued by the authorities in accordance with Art. 8/A, is lowered to 1 hour for social network providers with more than ten million daily visits, from the 4 hours it was previously. Providers exceeding 10 million daily visits are further required to take measures against content previously removed through legal orders being re-published on the platform.

## **New Type of Sanction - Prohibiting Advertisers from Concluding New Transactions with Non-Compliant Social Network Providers**

Lastly, the amendment introduces a new sanction system for sustained non-compliance of social network providers. Under the new system, it will be possible for Information Technologies and Communications Authority ("ICTA") to prohibit real and legal persons residing in Türkiye from concluding transactions in relation to advertising with the non-compliant social network providers and also introducing traffic bandwidth restrictions.

### **- New Legal Framework for Game Platforms**

The amendments made in Internet Law introduces a legal framework for game platforms in Türkiye. With the amendments made in Internet Law, new definitions are introduced as "*game*", "*game distributor*", "*game developer*" and "*game platforms*" under Art. 2.

## **Age Ratings**

The first paragraph of Add. Art. 5 requires all games offered on the platform to carry age ratings, since it includes a general prohibition on the offering of non-rated games. However, the prohibition is not as strict as it seems, since an exception allowing platforms to offer non-rated games under a mature rating exists. Therefore, all games without an age rating may only

be offered under a default mature rating. Further details on the rating process is expected to be provided through secondary legislation in the future. It is also specifically regulated that the game platform will be obligated to comply with requirements related to content providers and hosting providers as well.

### **Representative Appointment**

Foreign game platforms with more than 100.000 daily visits from Türkiye are required to appoint a representative (legal or real person) in Türkiye and publish the representative's contact information on its website.

### **Parental Controls**

Game platforms are now legally obligated to offer adequate parental controls on their platforms. These controls must involve mechanisms allowing the parent to;

- Modify account settings
- Limit monetary transactions such as sales, rentals or premium memberships to parent consent.

### **Gradual Sanctions for Platforms**

The new rules establish a gradual system, beginning with a notification and ramping up to bandwidth reductions, with 5 steps in total in case of a non-compliance. The first step comprises a notification issued by ICTA, informing the platform of the obligations that have been found unfulfilled. Sustained non-compliance after a period of 30 days results in a smaller fine of 1 million Turkish Liras to ten million Turkish Liras. If non-compliance is preserved for another 30 days following the first fine, a larger fine of ten million Turkish Liras to thirty million Turkish fine is to be issued. Another 30-day period for the establishment of compliance is granted after the second fine, after which The ICTA Chairman may request a 30% reduction on traffic bandwidth to the platform from courts. If this request is granted by the court, another 30-day period is granted, and if the failure to comply persists, the Chairman may request a reduction of up to 50% as the final step. In summary, this process comprises one step involving notification, two steps involving fines and two steps involving bandwidth reduction.

By 1 November 2026, social media providers and gaming platforms are required to establish the necessary technical and administrative infrastructure and achieve full compliance. As experienced in previous social media regulations, it is anticipated that, following the effective date, the ICTA may once again conduct strict inspections and oversight in this regard.