

Impact of Social Media Law on Media Freedom in Turkey Monitoring Report

Extended Research - October 2020/October 2021



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INTRODUCTION

Through a series of amendments on Turkey's law on the regulation of publications on the internet and suppression of crimes committed by means of such publications, the Law numbered 5651 has expanded the scope of the "access blocking" mechanism enabling multiple bodies of the state apparatus to issue such orders and since the latest amendment in 2020 welcomed a new application, content removal orders. The latest amendments that have been accepted in 2020 brought the hindering of citizens' right to access accurate, reliable, and quality information in a timely manner as well as media freedom, to a new level through the implementation of further restrictive applications.

The law-making process was utterly opaque and far from being based on a pluralistic discussion as the opposition parties, civil society organizations, researchers, and academics focusing on this matter were kept outside of the drafting process; and they were only notified when the draft bill was already at the parliament stage. The law was accepted and approved by the President hastily; throughout this process based on the bits of information that were reflected in pro-government media, the experts of this field drew attention to the risks law bore in terms of digital rights & liberties, e-commerce, and especially the young entrepreneurs' actions.

We at the Media Research association have been analyzing the reflections on this draft bill since it first was mentioned in the media; and one of the most significant elements that we had focused throughout this process was the potential impact it would have on media freedom, monitoring the situation closely. Article 10 of the European Convention on Human Rights, which guarantees the freedom to hold opinions and to express them freely without government intervention, was frequently cited in this process as we pointed at the potential impact of the law.

Since its full enforcement on October 1, 2020, the law has had a major impact on the sustainability of digital content, particularly on news outlets with a total of 1197 removal orders. Throughout the law has been in force, newsrooms have received a series of removal orders with subject lines ranging from claims of corruption and irregularities, misconduct, political conflict, murder, assault and bodily harm, fraud, harassment, suicide, gambling, environmental damage, suspicious death, sabotage, protest and assembly. Throughout this process we have detected 1197 news articles that received removal orders, curtailing citizens' right to access news and information as well as media freedom.

We have initiated this monitoring and reporting activity to have a better insight into the law -which is more commonly known as "Social Media Law"- and how it affected media outlets in the country. The report covers the period between October 2020 and October 2021, consisting of input from 36 news outlets that have shared information with us concerning the subject, object, legitimation of the articles that received content removal orders. Similar to the interim report of this process, the "violation of personal rights" makes up more than 90% of all removal orders, although the term is vaguely defined in the Turkish Penal Code.

During the legitimation of the law in the parliament, governing alliance frequently cited "security concerns" and referred to the law as "a mechanism which will allow citizens to protect their personal rights online". However, when we look at how the law has been used after a year of its coming into force, it can be seen that the majority of the removal orders originated from not the civilian citizens but high-level bureaucrats, ministers, and business people.

Complaints for news articles mentioning corruption and irregularity claims were primarily targeted by businesspeople, senior bureaucrats, and companies. When we look at the news related to misconduct, we can see the source of removal orders as high-level bureaucrats, unknown sources, business people, ministers, district governors, senior members of political parties are listed on top. In the field of political conflict, companies, ministers, senior members of political parties are again the main sources for removal. In the murder news, again business people and district governors; and in the field of fraud news, business people and companies are the top sources. The most popular removal category, news of corruption and irregularities combined with misconduct present the top sources as high-level bureaucrats, ministers, business people, provincial directors of education; in addition it is significant to note that there are also four news articles that received removal orders upon request from a sportsperson in this category.

The report that we have published only includes the content removal orders targeting news centres operating nation-wide and not the local media outlets that make up a sizable part of the available online media in Turkey. In the coming period we would like to expand the scope of the monitoring and reporting activity to include local media with the aim of offering a more comprehensive understanding of the law's impact on media freedom and citizens' right to access news and information. We hope to continue monitoring and reporting on this issue in order to raise public awareness on digital rights & liberties. We do hope that this report will be well-received by news platforms and civil society organizations that focus on media freedom and freedom of expression; and further hope that the report will strengthen the efforts to guarantee digital rights and liberties in Turkey.

Gürkan Özturan

Research Coordinator

December 2021

RESEARCH DESIGN

2.1. RESEARCH METHOD

The aim of the **Impact of Social Media Law on Media Freedom in Turkey Monitoring Report** is to understand how independent media outlets have been affected by Turkey's Social Media Law, which was ratified in July 2020 and went in effect in October 1, 2020, and to identify the associated violations of rights and freedoms, including the right to access information, media 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 October 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, dokuz8NEWS, BirGün Daily, Evrensel Daily, Artı Gerçek, Cumhuriyet, ODA TV, Bianet, Susma Platform 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 36 news outlets was created.

In the scope of the research, a total of 1197 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 media 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 14 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, eleven 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.

In the graphs, the title of **Provincial Director of National Education** is **P. Dir. of National Education** and **Senior Member of Political Party** is abbreviated as **S.M. Political Party**.



TOPICS OF NEWS ARTICLES

In the scope of the **Impact of Social Media Law on Media Freedom in Turkey Monitoring Report**, the news content that were targeted by content removal requests were categorized into 14 groups, which are: 'corruption and irregularities', 'misconduct', 'political conflict', 'murder', 'environmental damage', 'harassment', 'sabotage', 'assault and bodily harm', 'suicide', 'aggravated fraud', 'gambling', which is described as a misdemeanor, 'suspicious death' and 'protest & assembly'. 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.

In terms of the type of death, the news that 'does not originate from natural causes' is '**suspicious death**'; Events that occur as a result of people exercising their right to assemble and protest for any reason are listed as news on '**protest & assembly**'.

3.1. Grand Total

In the scope of the research, 1197 content removal requests were reviewed. The majority of these requests were placed to remove news articles about '*corruption and irregularities*' (675 items) and '*misconduct*' (466 items).

The other themes are: *Political conflict* (79 items) '*murder*' (58 items), '*assault and bodily harm*' (54 items), '*aggravated fraud*' (53 items) '*harassment*' (31 items), '*suicide*' (17 items) '*gambling*' (9 items), '*environmental damage*' (9 items).

There were no details available about the content of 43 news items for which takedown requests were placed.

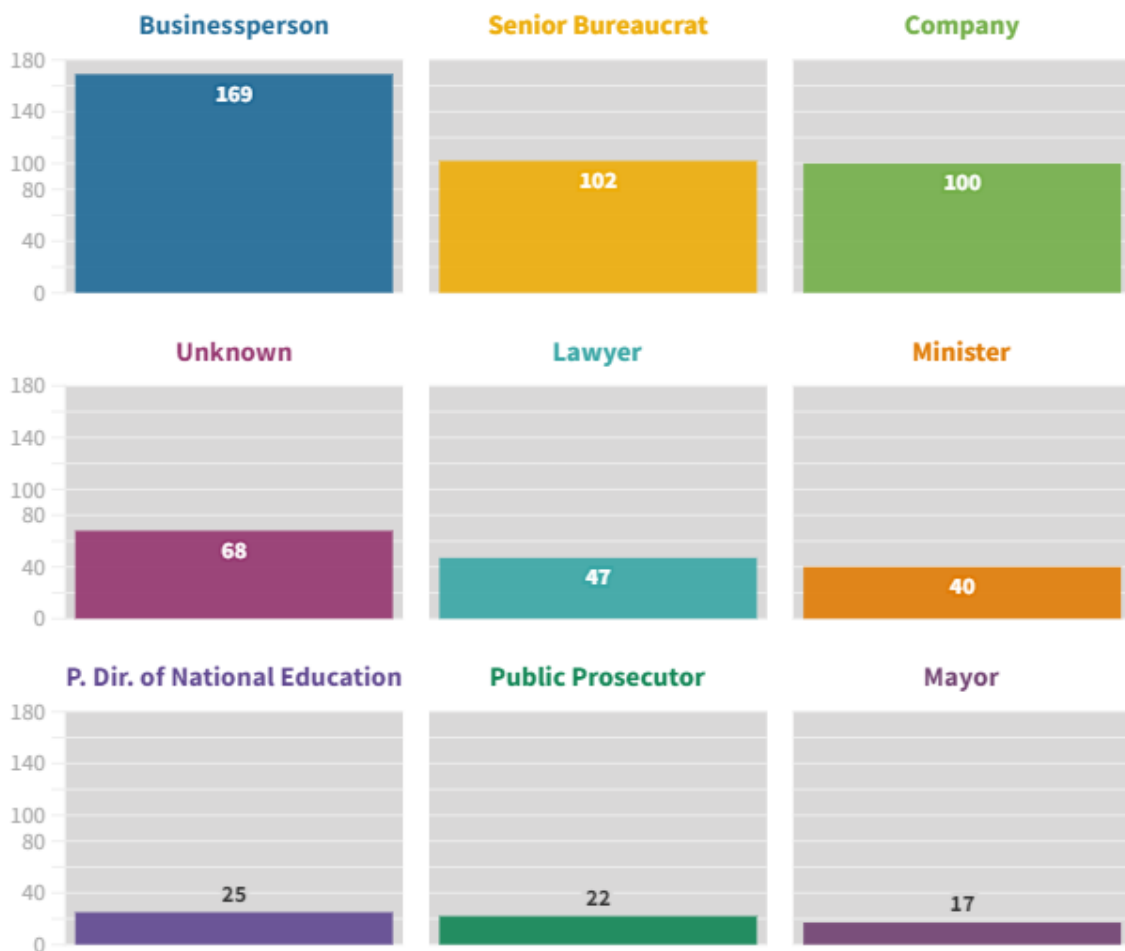
Distribution of News Topics Requested to be Taken Down

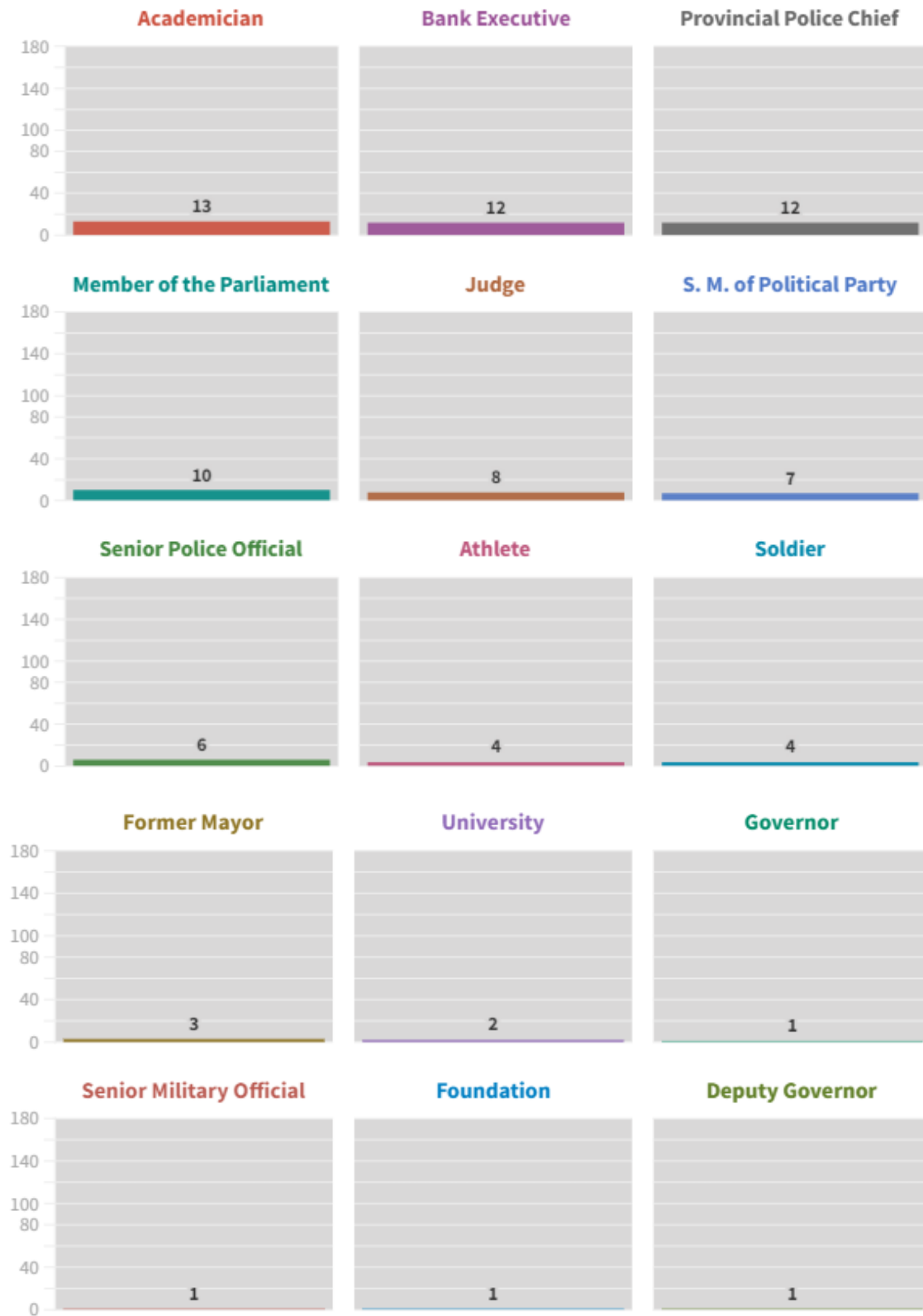


Research data demonstrates that the majority of the complainants who went to court to take down news articles about '*corruption and irregularities*' were **business people** (169 items), **senior bureaucrats** (102 items) and **companies** (100 items).

The other complainants who requested removal of online content describing '*corruption and irregularities*' include **lawyers** (47 items), **ministers** (40 items), **provincial director of national education** (25 items).

Vocational Positions of Complainants Related to Corruption and Irregularity News





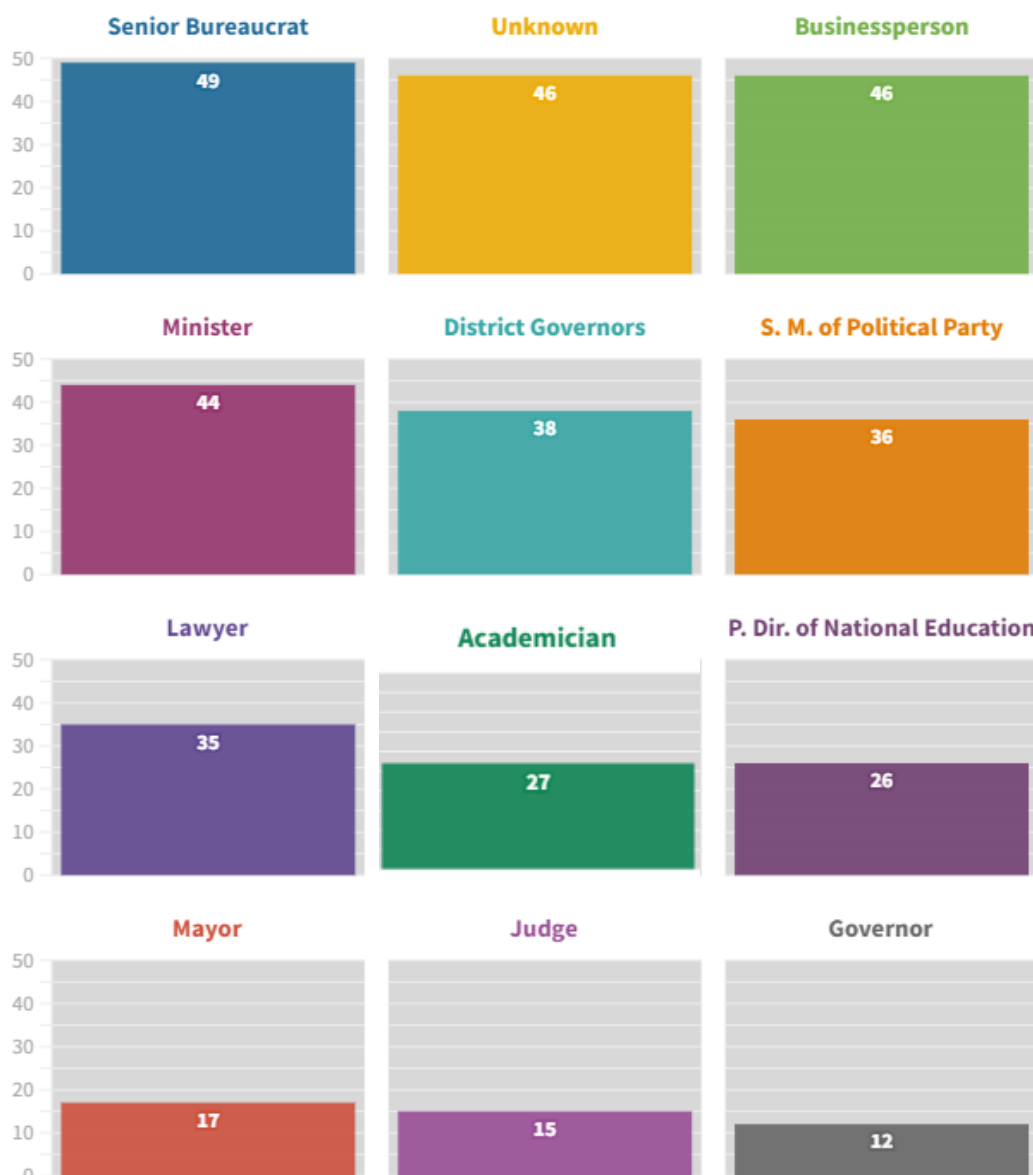
The complainants who placed takedown requests against news reports on '*misconduct*' include: **Senior bureaucrats** (49 items), **business people** (46 items), **ministers** (44 items), **district governors** (38 items), **senior members of political parties** (36 items), **lawyers** (35 items) and **academics** (27 items).

The complainants who filed petitions to remove news pieces on '*murder*' include **business people** (16 items) and **district governors** (14 items). Majority of the individuals who requested removal of news on '*political conflict*' were **companies** (34 items) and **ministers** (30 items). The individuals who targeted news content on '*assault and bodily harm*' were almost exclusively **civilians** (27 items).

The majority of the individuals who requested the removal of news pieces on '*harassment*' were **defendants** (12 items). Majority of the complainants against news reports on '*suicide*' were **civilians** (16 items).

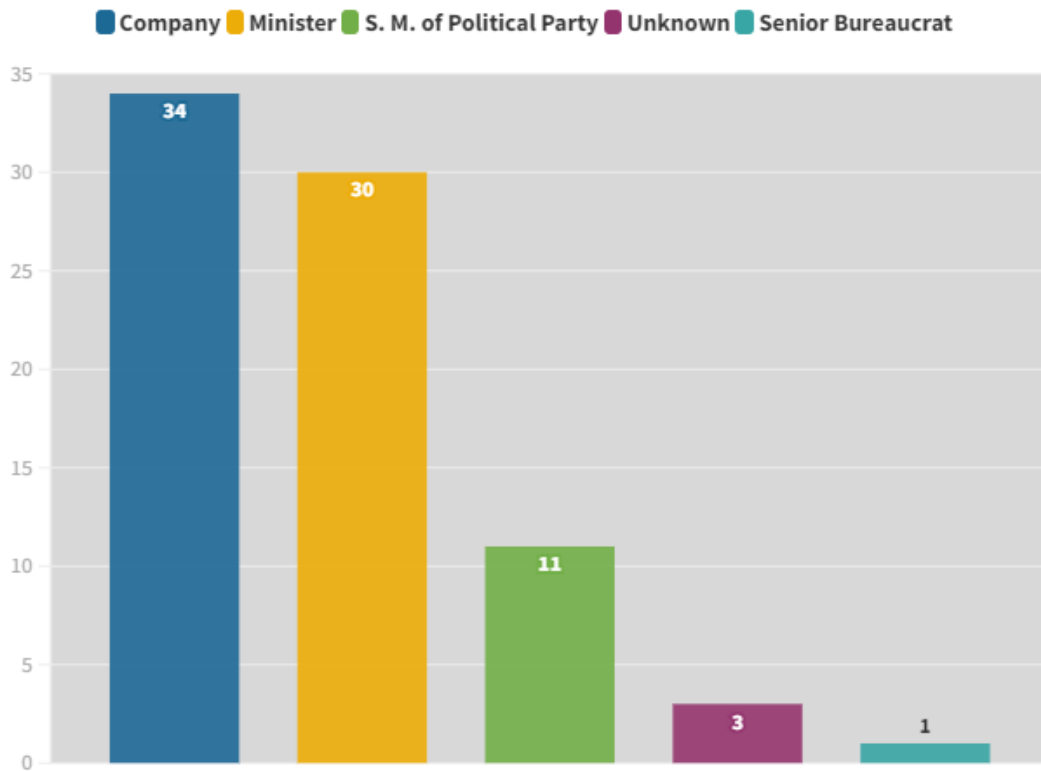
Similarly, all complaints against news items on '*gambling*' were submitted by **artists** (9 items) and majority of removal requests for news reports on '*environmental damage*' came from **businesses** (5 items)

Vocational Positions of Complainants Related to Misconduct News

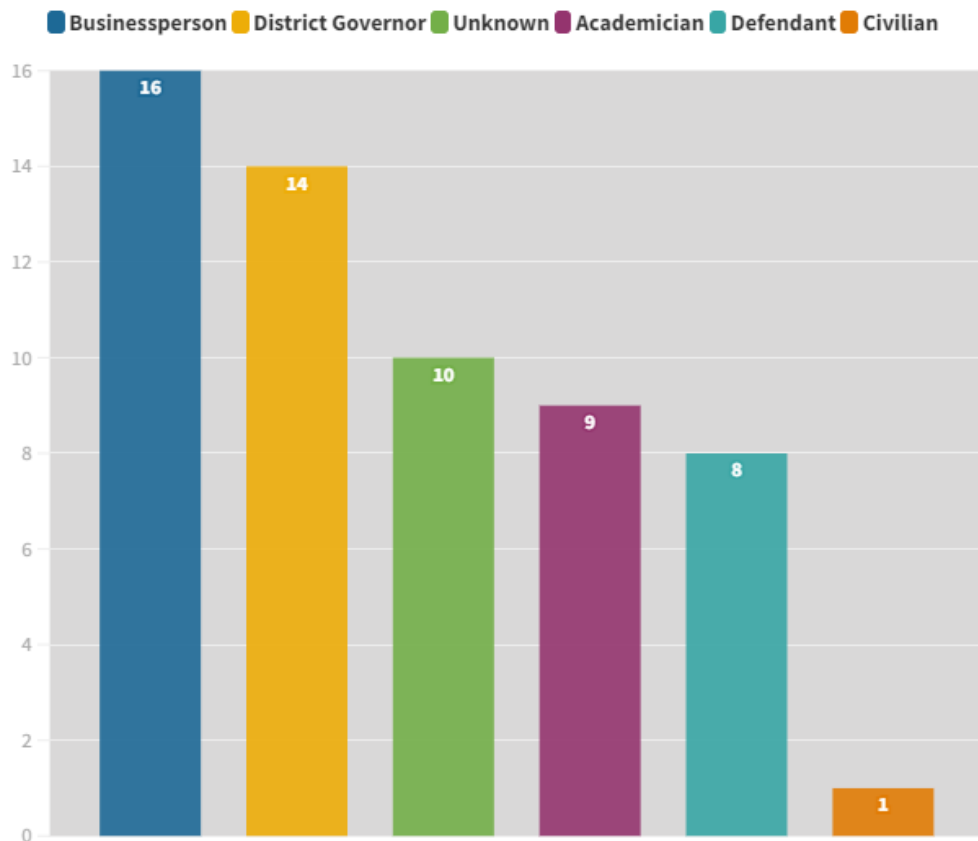




Vocational Positions of Complainants Related to Political Conflict News

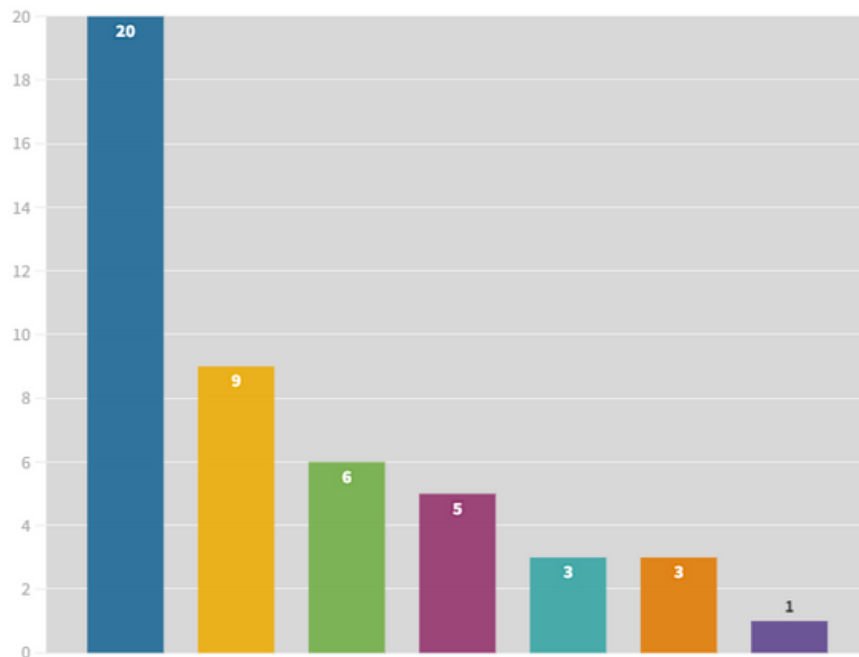


Vocational Positions of Complainants Related to Murder News



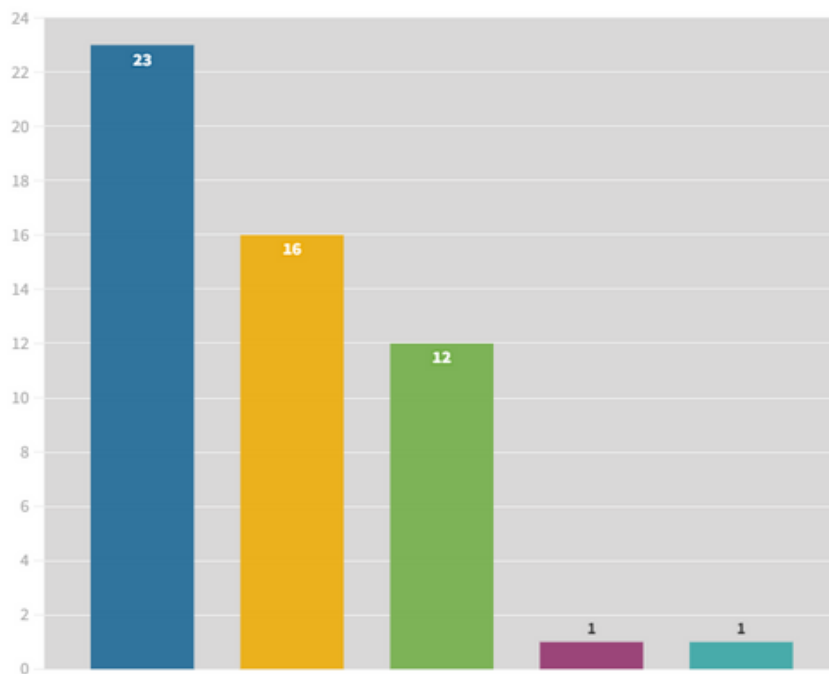
Vocational Positions of Complainants Related to Assault and Bodily Harm News

■ Civilian ■ District Governors ■ Businessperson ■ Defendant ■ Member of the Parliament ■ Unknown ■ Soldier



Vocational Positions of Complainants Related to Aggravated Fraud News

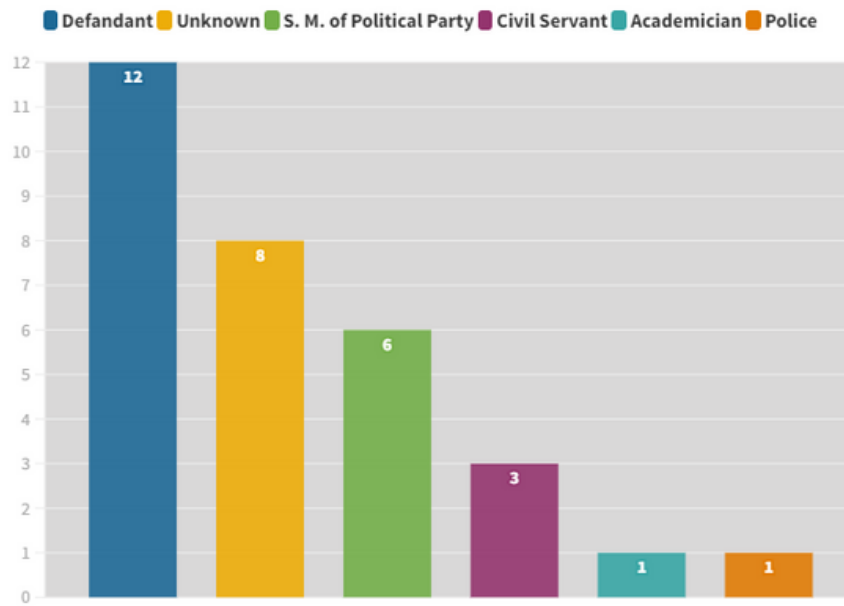
■ Businessperson ■ Company ■ Civilian ■ Soldier ■ Unknown



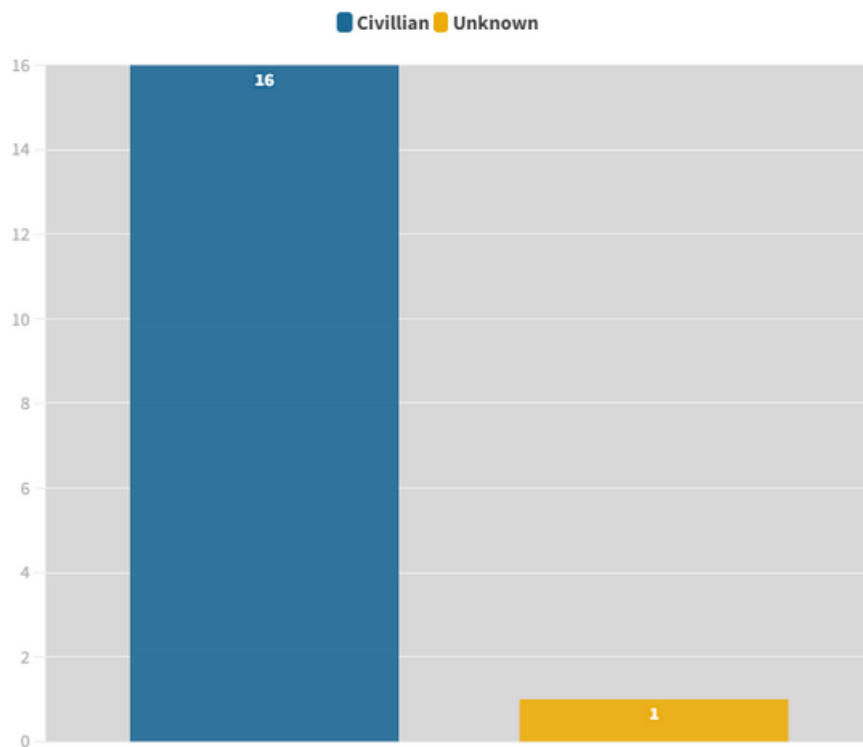
In our analysis, it was understood that the content targeted by removal requests may contain allegations of multiple offenses.

For example, 202 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 **provincial director of national education** (25 items).

Vocational Positions of Complainants Related to Harassment News



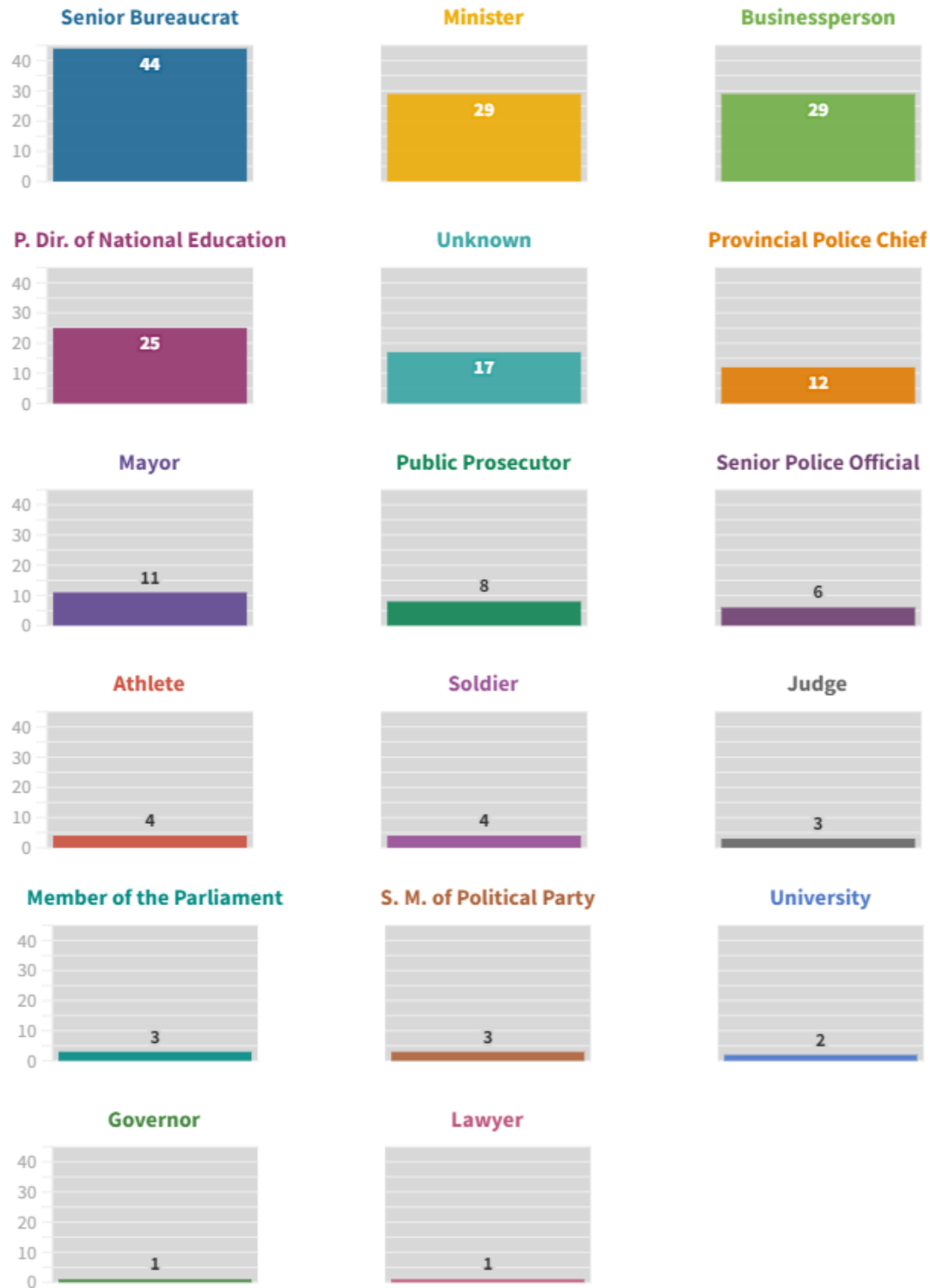
Vocational Positions of Complainants Related to Suicide News



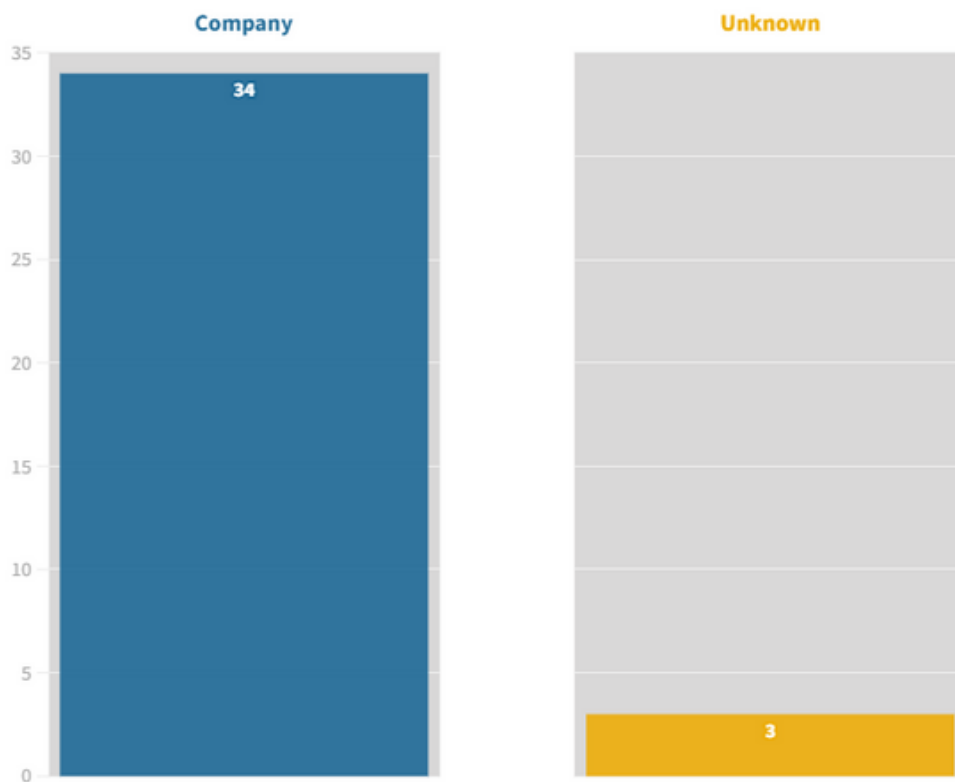
Besides, there were 15 news reports describing actions involving both '*misconduct and harassment*'. In this case, the majority of the complainants were **senior members of political parties** (6 items). In addition to that 37 news articles contained information about '*corruption and irregularity*' and '*political conflict*'. The complainants against these news articles were mainly **companies** (34 items). There were 18 news '*corruption and irregularity*' and '*fraud*'. In this case, the majority of the complainants were **companies** (16 items).

Additionally '*misconduct*' and '*murder*' were cited concurrently in 22 news reports. **District governors** applied to the court for 14 of them. '*Misconduct*' and '*assault and bodily harm*' were intertwined in 10 news reports. Nine of the mentioned news were requested by the people with the title of **district governors**.

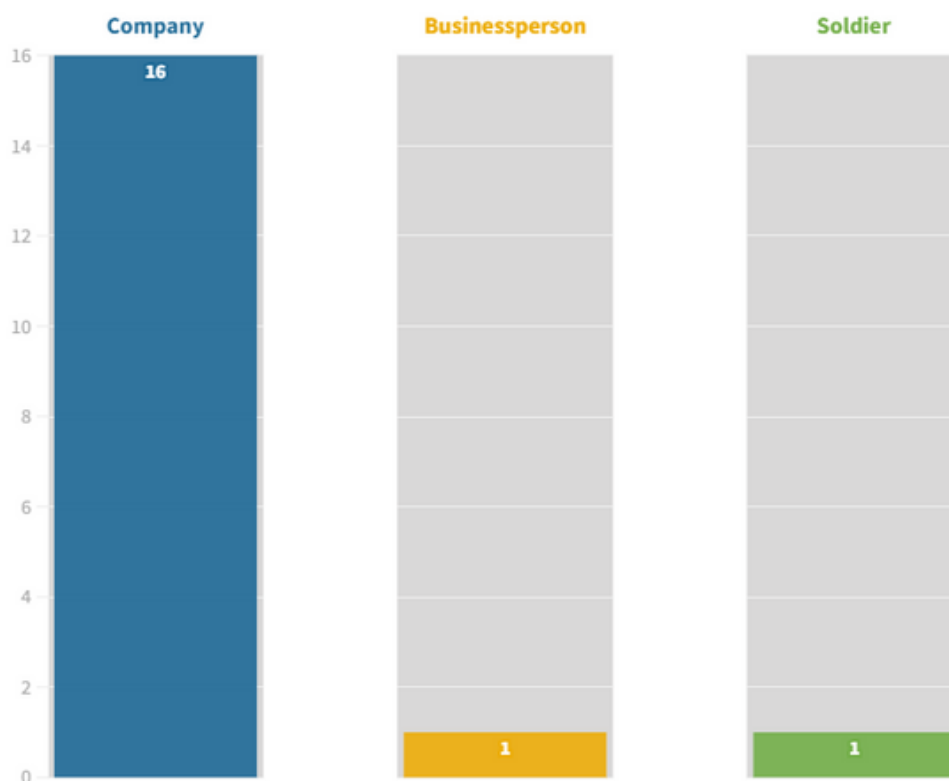
Vocational Positions of Complainants Regarding News of Containing Allegations of Corruption and Irregularities and Misconduct



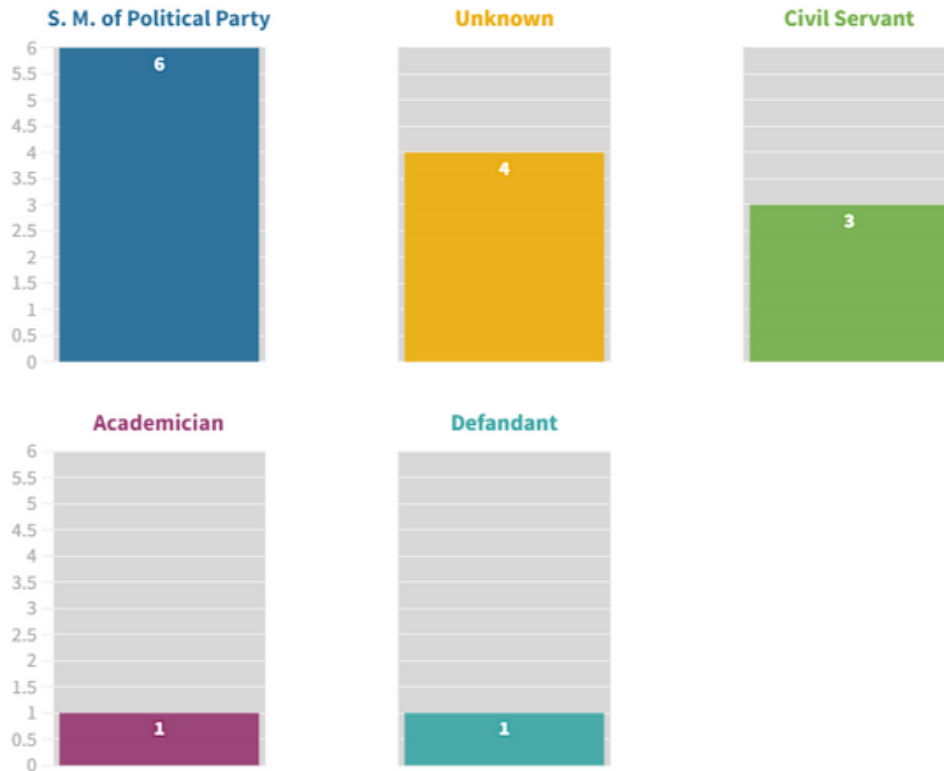
Vocational Positions of Complainants Regarding News of Containing Allegations of Corruption and Irregularities and Political Conflict



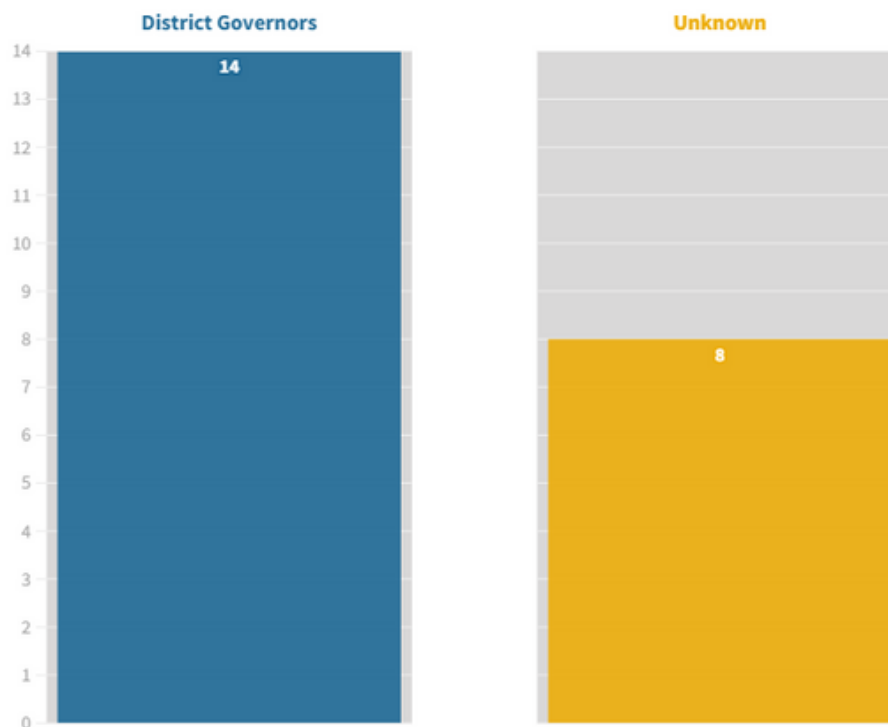
Vocational Positions of Complainants Regarding News of Containing Allegations of Corruption and Irregularities and Aggravated Fraud



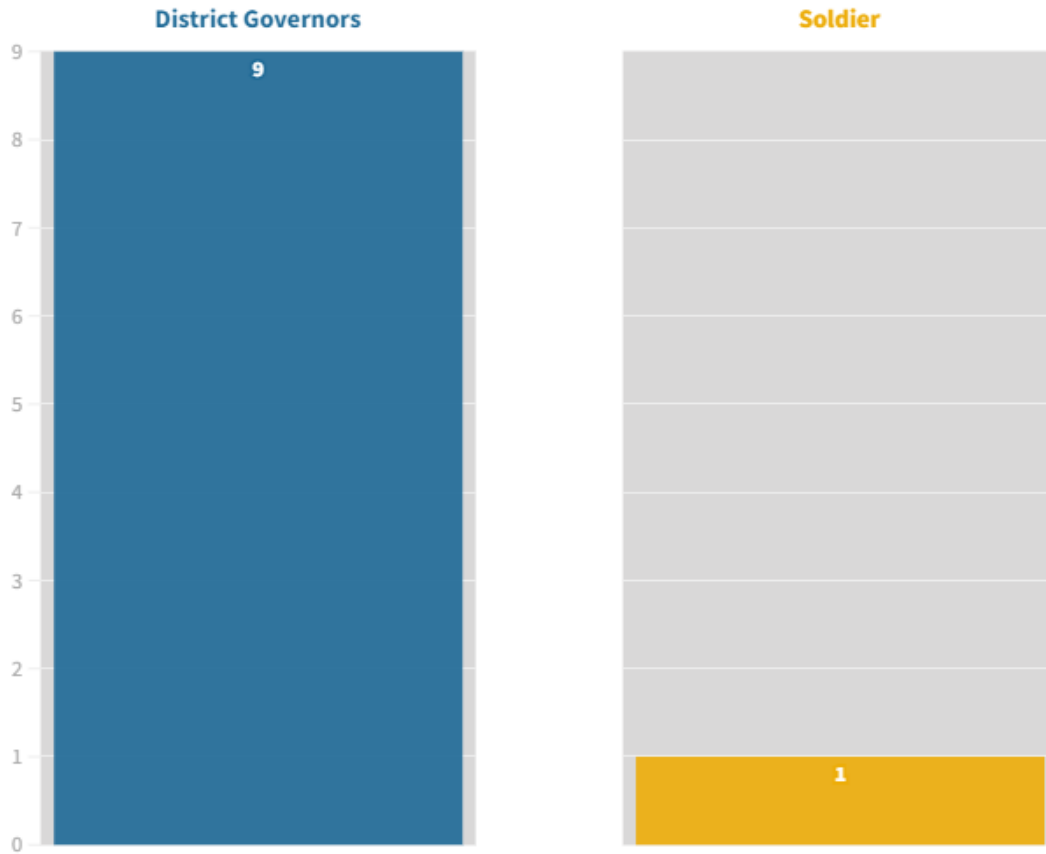
Vocational Positions of Complainants Regarding News of Containing Allegations of Misconduct and Harassment



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



Vocational Positions of Complainants Regarding News of Containing Allegations of Misconduct and Assault and Bodily Harm



JUSTIFICATIONS FOR CONTENT REMOVAL REQUESTS

In the scope of the **Impact of Social Media Law on Media Freedom in Turkey Monitoring Report**, the legal justification for content removal requests were categorized into 11 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', 'propaganda of terrorist organisation', '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.

Propaganda of a Terrorist Organization: The 'propaganda crime' organized within the scope of the anti-terrorism crime of the Turkish Penal Code is defined as a verb that can be committed in writing or verbally and/or through the media. The contents of the removal order for the aforementioned crime are listed under this heading.

4.1 Grand Total

In this research, 1197 online news items targeted by content removal requests were reviewed. The significant majority of these requests were based on '*violation of personal rights*' (1080 items).

The second most commonly cited justification was the '*right to be forgotten*' (100 items). The other justifications are:

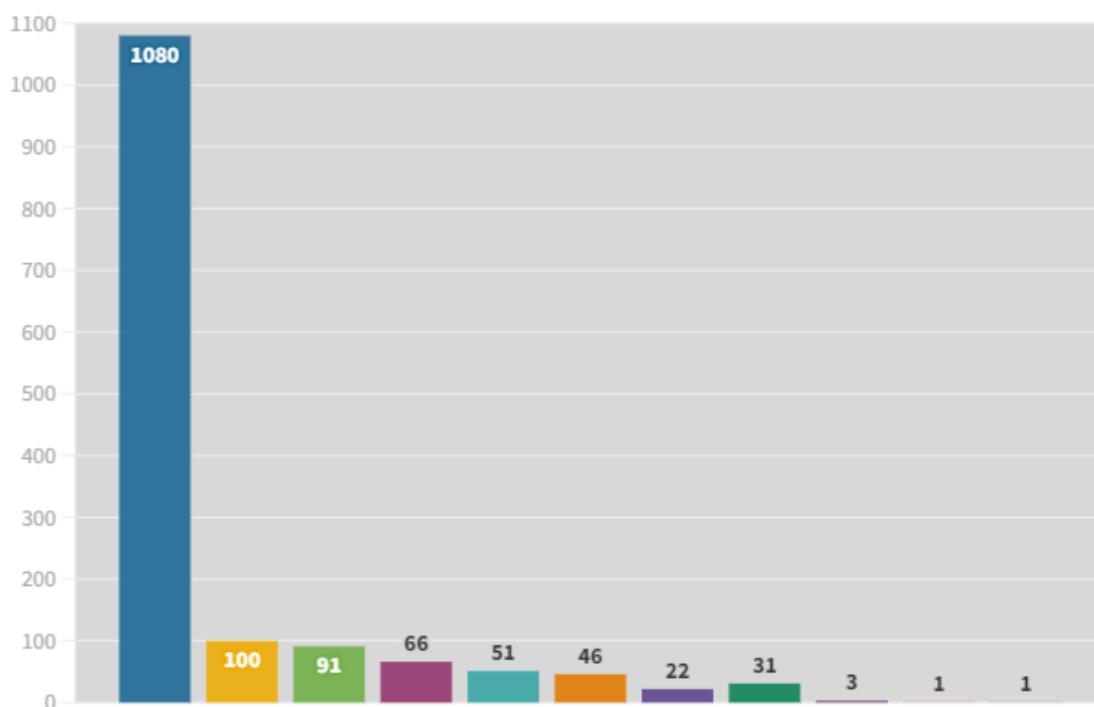
'*Damage to business reputation*' (91 items), '*absence of public interest*' (66 items), '*violation of privacy*' (51 items), '*violation of presumption of innocence*' (46 items), '*right against self-incrimination*' (22 items), '*propaganda of terrorist organisation*' (3 items) '*copyright violation*' (1 item), '*violation of child's safety principle*' (1 item), and '*unknown*' (31 items).

The majority of the complainants who requested removal of online content due to '*violation of personal rights*' were **business people** (231 items).

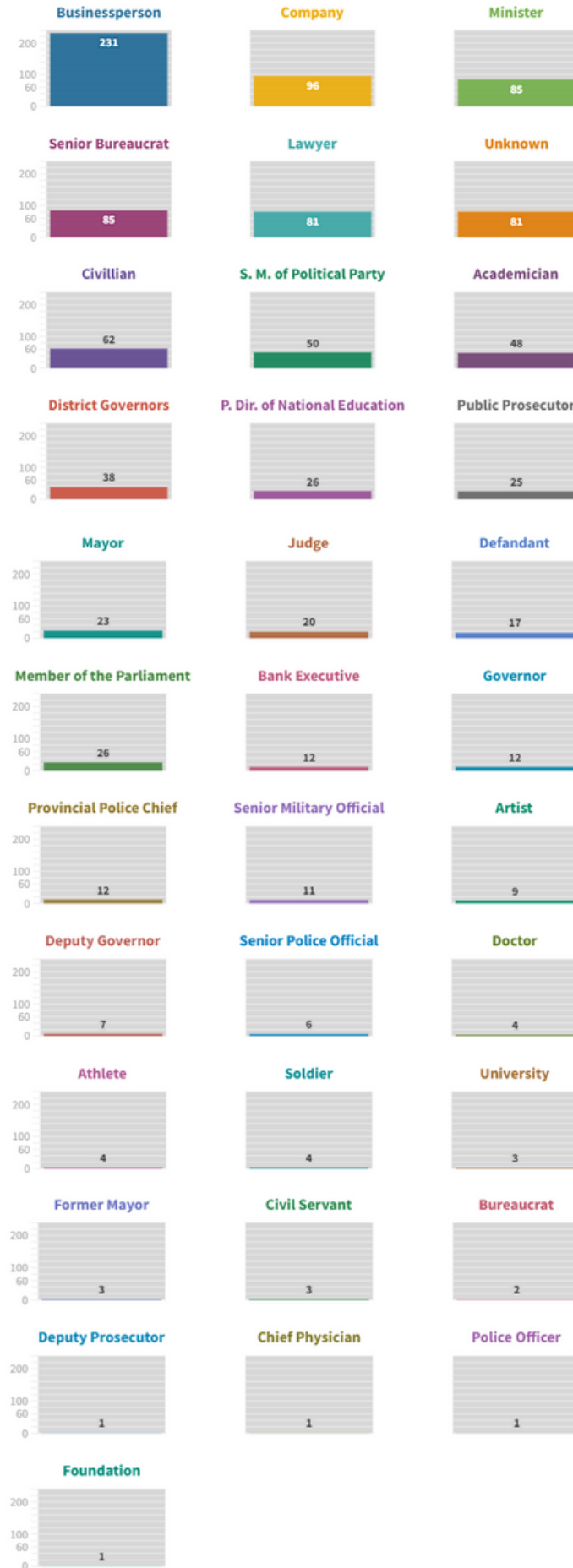
The news pieces which were subject to content removal orders due to '*violation of personal rights*' were mainly reports of '*corruption and irregularities*' (168 items).

Justifications for Content Removal Requests

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

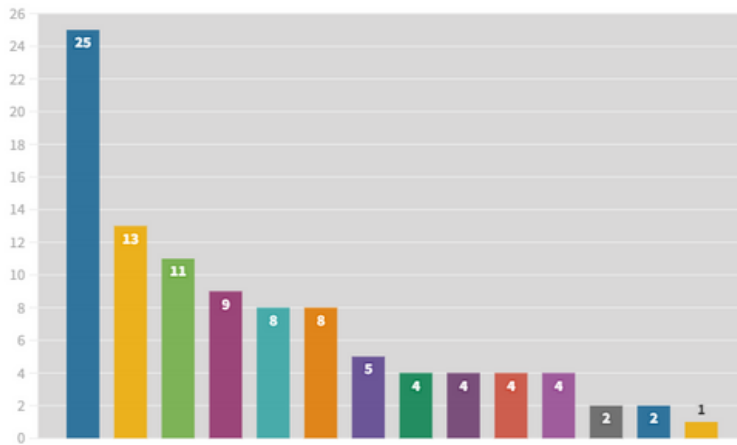


Distribution of Contents Requested to be Removed Based on Violation of Personal Rights by Vocational Positions of Complainants



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

Senior Bureaucrat Civilian S. M. of Political Party Academician Defendant Senior Military Official
Public Prosecutor Soldier Member of the Parliament Company Doctor Unknown Lawyer Mayor



The majority of the content takedown requests based on the 'right to be forgotten' (25 items) came from **senior bureaucrats**.

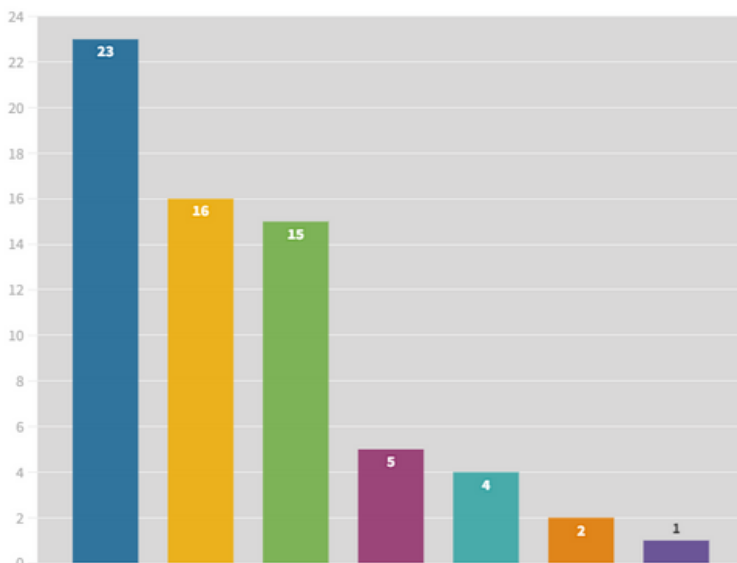
Besides, all requests placed on the basis of this justification also cited 'violation of presumption of innocence'.

In addition, all news articles targeted on the grounds of this justification were reports mentioning both 'corruption and irregularities' and 'misconduct'.

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'.

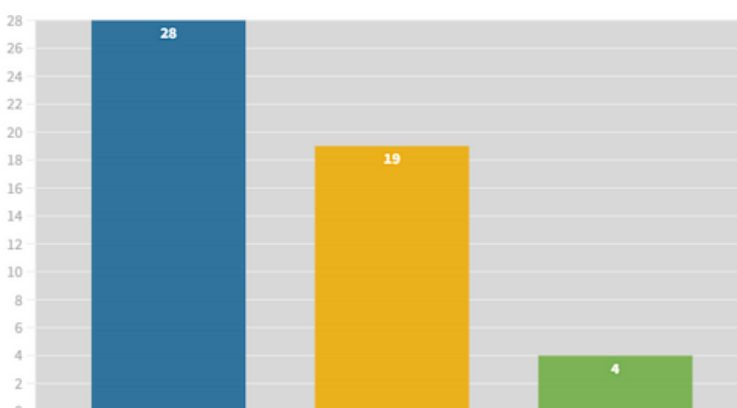
Distribution of Contents Requested to be Removed Based on Absence of Public Interest by Vocational Positions of Complainants

Lawyer Businessperson District Governor Public Prosecutor Doctor Unknown Senior Military Official



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

Civilian Senior Member of Political Party Member of the Parliament



The majority of content removal requests on the grounds of 'privacy' were placed by **civilians** (28 items). 23 out of these 28 news items were about 'assault and bodily harm'.

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*.'

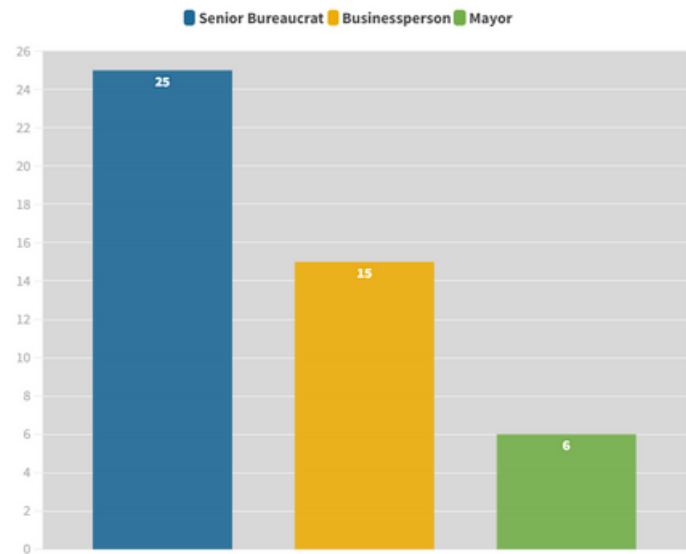
The complainants in content removal requests that were based on '*damage to business reputation*' were primarily **companies** (89 items). The main theme in these news pieces was '*corruption and irregularities*' (79 items).

The position of the actors who placed takedown requests due to '*copyright violation*' and '*violation of child safety policy*' was unknown.

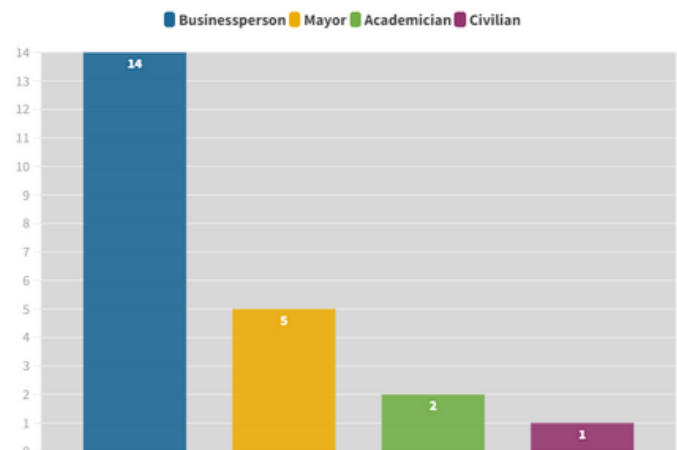
Some of the justifications listed above were concurrently used in numerous content removal requests. For example, 56 requests were based on both '*violation of personal rights*' and '*the right to be forgotten*.'

In this context, the requests which were based on two different justifications primarily came from **senior members of political parties** (10 items) **civillians** (9 items), **academics** (9 items) and **senior military official** (8 items). These news articles essentially reported on actions involving '*misconduct*' (25 items) and '*corruption and irregularities*' (22 items).

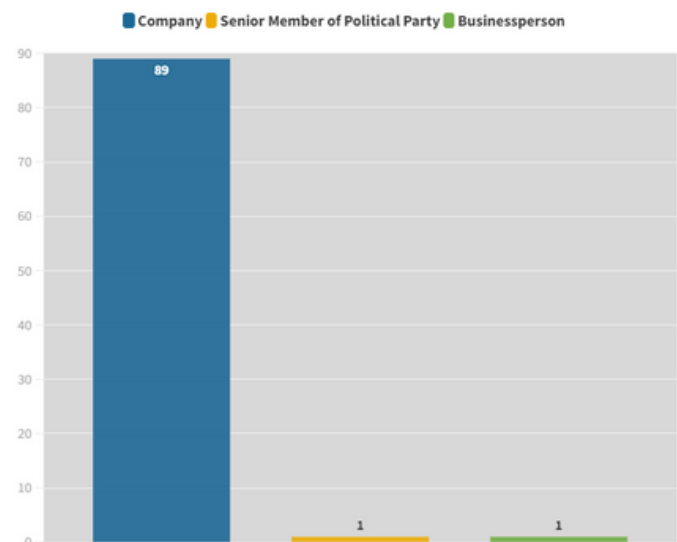
Distribution of Contents Requested to be Removed Based on Violation of Presumption of Innocence by Vocational Positions of Complainants



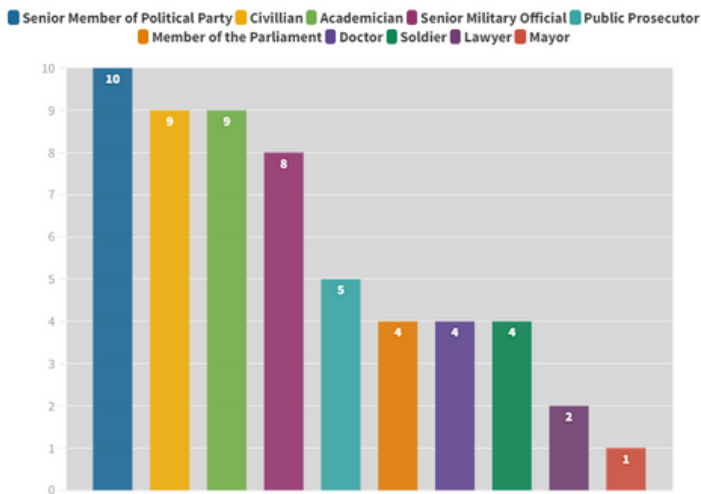
Distribution of Contents Requested to be Removed Based on The Right Against Self-Incrimination by Vocational Positions of Complainants



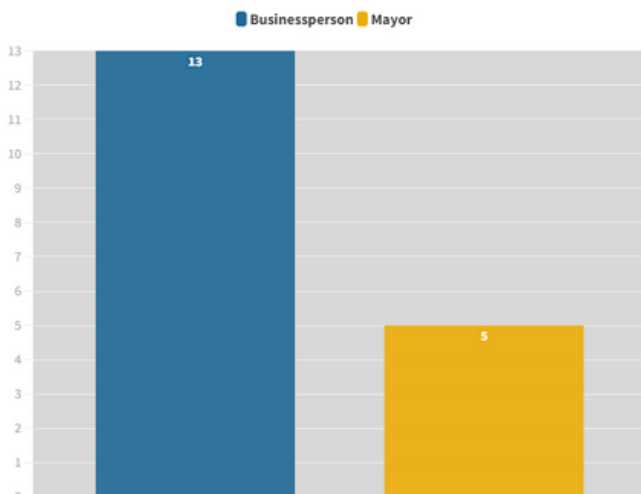
Distribution of Contents Requested to be Removed Based on Damage to Business Reputation by Vocational Positions of Complainants



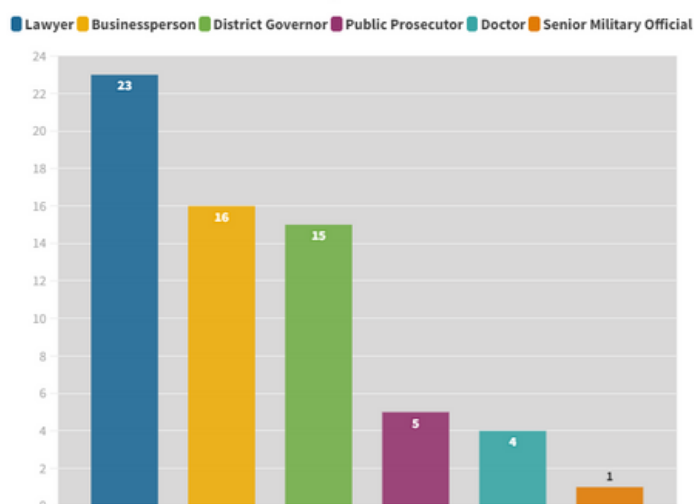
Distribution of Contents Requested to be Removed Based on Violation of Personal Rights and The Right to Be Forgotten by Vocational Positions of Complainants



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



For example, 21 requests were based on 'violation of personal rights' and 'violation of presumption of innocence'.

15 out of these 21 requests, the complainants were **business people**. In 6 of the decisions were mentioned, persons with the title of **mayor** were plaintiffs and the news was about *fraud* (13 items), *'misconduct'* (8 items), *'corruption-irregularities'* (3 items).

In the two contexts, *'misconduct'* and *'corruption-irregularities'* intersect.

In addition, the reasons for 'violation of personal rights' and 'privacy' were used side by side in the decision to remove 30. In 19 of these decisions, there were people who were **senior members of political parties** in the position of plaintiffs, and all of these reports were on *'misconduct'*. The group were followed by **civilians** (7 contents) and **members of the parliament** (4 contents).

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**. 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 64 content removal requests. The majority of complainants were **lawyers** (23 items), followed by **business people** (16 items) and **district governors** (15 items).

45 of the reports were *'misconduct'*; 13 were about *'fraud'* and 9 were about *'corruption and irregularities'*. The two reports intertwined *'corruption and irregularities'* with *'misconduct'*

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, 34 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, Former Mayor, Governor, Soldier, Police Officer, Senior Police Official, Provincial Director of National Education, Members of the Parliament, Judges, Public Prosecutors, Deputy Prosecutors, Deputy Governors, District Governors, School Principals, Chief Physicians, Senior Military Officials, Provincial Police Chief, Other Senior Bureaucrats*
Legal Persons	Companies, Foundation, Gendermerie, Universities
Private Entities	Senior Members of Political Parties, Bank Executives, Business People, Lawyers, Academics, Doctor, Athletes, Artists, Defendants, Civilians

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

5.1 Grand Total

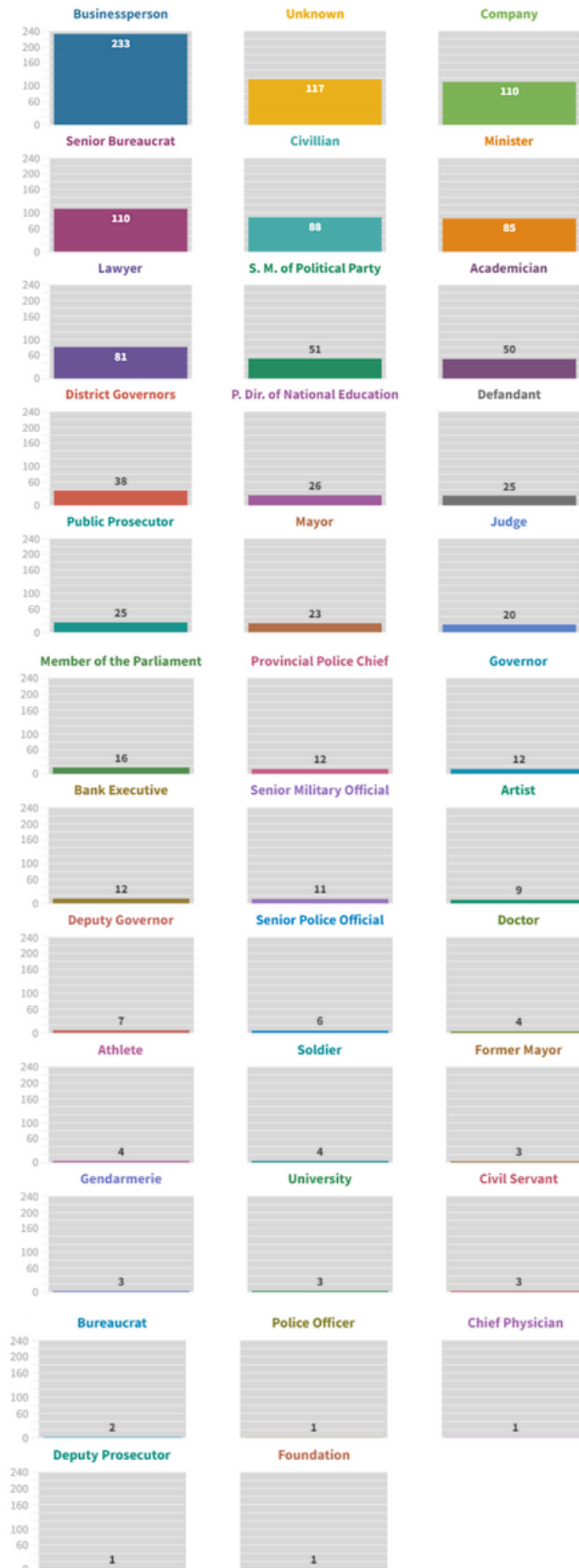
According to the research findings, the highest number of content removal requests were placed by **business people** (233 items). This group was followed by **companies** (110 items), **senior bureaucrats** (110 items), **civilians** (88 items), **ministers** (85 items), **lawyers** (81 items), **senior members of political parties** (51 items), and **academics** (50 items), **district governors** (38 items), respectively.

The other complainants include: **Provincial director of national education** (26 items), **public prosecutors** (25 items), **defendants** (25 items), **mayors** (23 items),

judges (20 items), **members of the parliament** (16 items), **bank executives** (12 items), **provincial police chiefs** (12 items), **governors** (12 items), **senior military officials** (11 items), **artists** (9 items), **deputy governors** (7 items), **senior police officials** (6 items), **athletes** (4 items), **doctors** (4 items), **soldiers** (4 items), **former mayors** (3 items), **gendermerie** (3 items), **civil servants** (3 items), **universities** (3 items), **bureaucrats** (2 item), **chief physician** (1 item), **foundation** (1 items) **deputy prosecutor** (1 item), **police officer** (1 items).

In content removal requests placed for 117 news items, the positions of the complainants were unknown.

Vocational Positions of Complainants



Business people (233 items) primarily applied for removal of news pieces on 'corruption and irregularities' (169 items), 'misconduct' (46 items), 'aggravated fraud' (23 items), 'murder' (16 items), 'assault and bodily harm' (6 items), 'sabotage' (1 items). Out of these 233 news items, 29 covered allegations of both 'corruption and irregularities' and 'misconduct'.

Companies (110 items) often filed applications to remove news articles on 'corruption and irregularities' (100 items), 'political conflict' (34 items), fraud (16 items) and 'environmental damage' (5 items). All 'political conflicts' and all news reports of 'fraud' that **companies** were applied to take off the air were intertwined with the issue of *corruption and irregularities*.

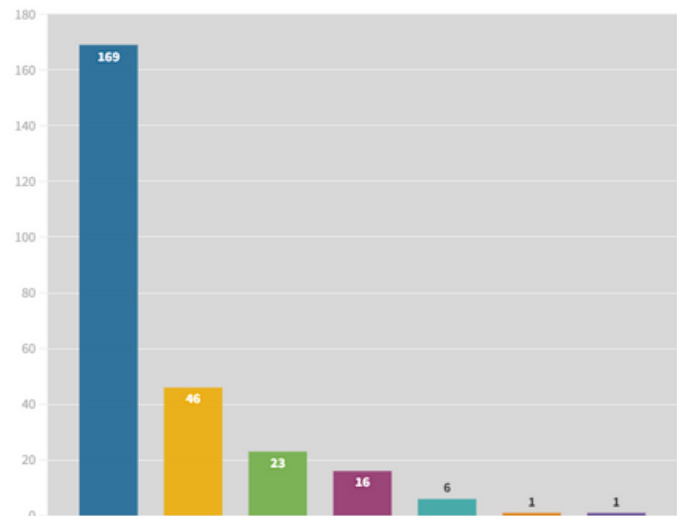
Senior bureaucrats (110 items) applied to the courts for removal of 102 news articles on 'corruption and irregularities' and 49 news pieces on 'misconduct'. 44 of these news articles covered actions involving both offenses.

Civilians (88 items) were subjects of news on, predominantly 'assault and bodily harming' (27 items), 'suicide' (16 items) and 'fraud' (12 items).

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.'

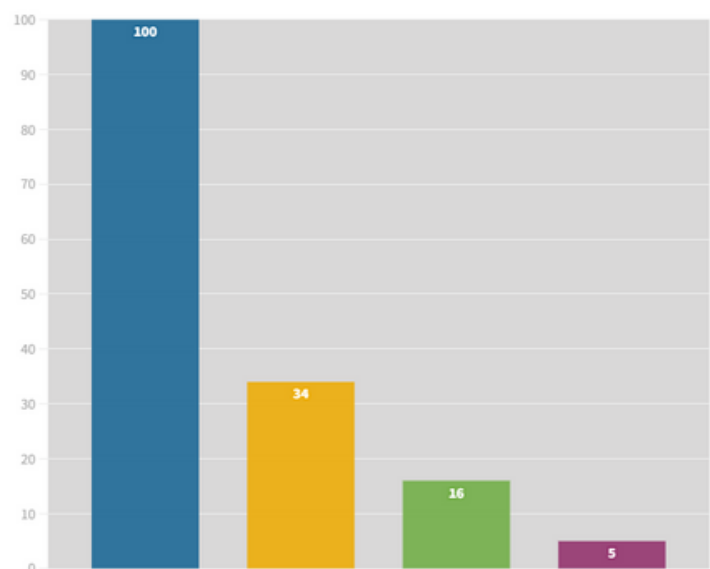
Distribution of News Topics Requested to be Taken Down by Business People

Corruption and Irregularities Misconduct Aggravated Fraud Cinayet Assault and Bodily Harm Sabotage Unknown



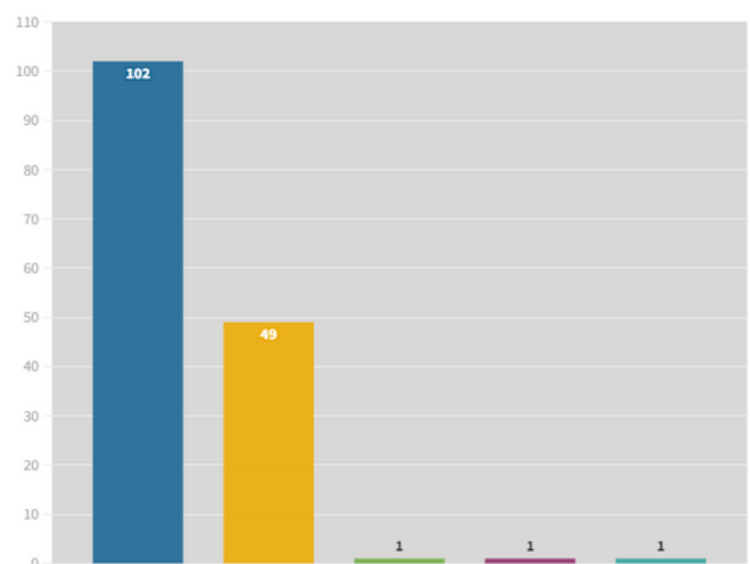
Distribution of News Topics Requested to be Taken Down by Companies

Corruption and Irregularities Political Conflict Aggravated Fraud Environmental Damage

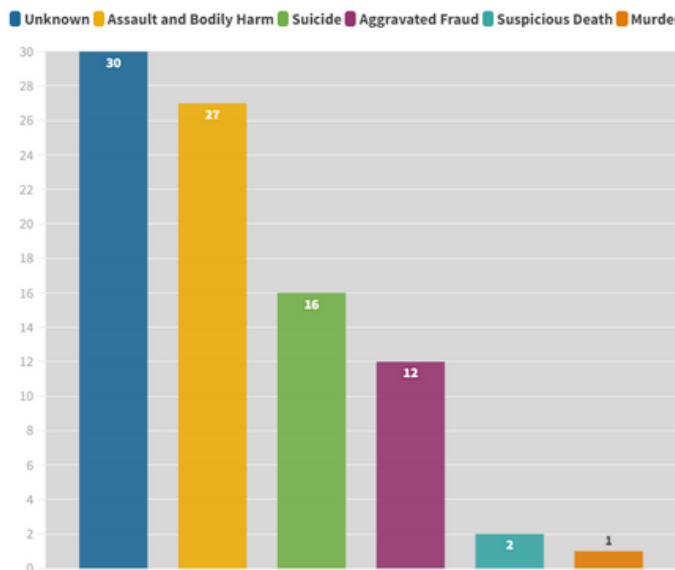


Distribution of News Topics Requested to be Taken Down by Senior Bureaucrats

Corruption and Irregularities Misconduct Political Conflict Protest & Assembly Unknown



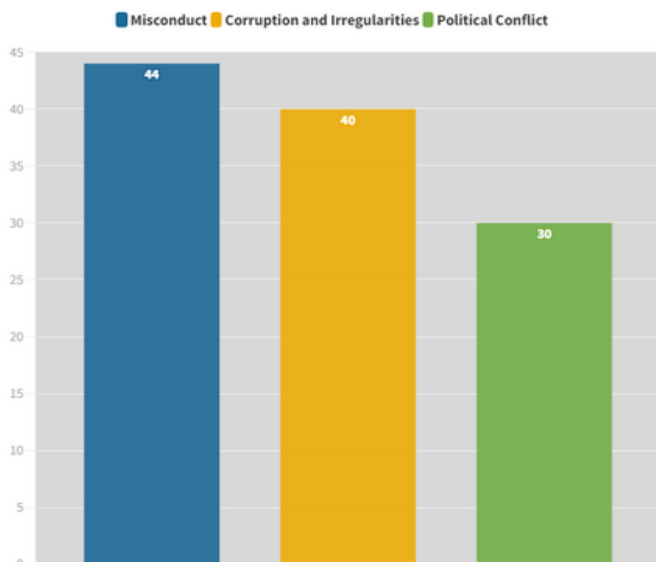
Distribution of News Topics Requested to be Taken Down by Civilians



Lawyers requested the removal of 81 news items, including 47 articles about '*corruption and irregularities*' and 35 articles on '*misconduct*'. One of these news articles describe allegations of both offenses.

Senior members of political parties (51 items) mainly appealed against news reports on '*misconduct*' (36 items). A total of six news reports featured allegations of '*misconduct*' and '*harassment*'. In the three contexts, the issues of '*misconduct*' and '*corruption and irregularities*' were intertwined.

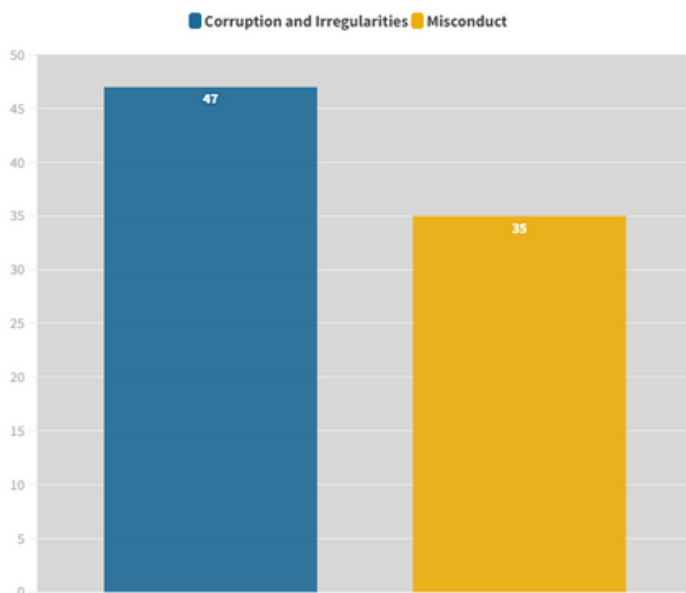
Distribution of News Topics Requested to be Taken Down by Ministers



The news articles that covered allegations against **academics** (50 items) were primarily about '*misconduct*' (27 items), '*corruption and irregularities*' (13 items) and '*murder*' (9 items). There was also one news article containing allegations of '*harassment*' and '*misconduct*'.

District governors (38 items) exclusively filed complaints against news articles on '*misconduct*.' The 38 stories mentioned were intertwined with '*murder*' in 14 contents, '*assault and bodily harm*' in 9 contents.

Distribution of News Topics Requested to be Taken Down by Lawyers



The **provincial directors of national education** applied to the court to take 26 news pieces which intertwined with topic of '*corruption-irregularities*' and '*misconduct*' in total 25 of the contents.

The **defendants** (25 items) applied to the judiciary to take 12 '*harassments*', 8 '*murders*' and 5 '*assault and bodily harm*' news from the publication. Both '*misconduct*', '*harassment*' and '*suspicious death*' topic were seen together in one report.

The news reports which were taken to court by **prosecutors** (25 items) mainly reported on '*corruption and irregularities*' (22 items) and '*misconduct*' (11 items). 8 of these reports mentioned both offenses.

Mayors (23 items) also targeted news articles on allegations of '*misconduct*' (17 items) and '*corruption and irregularities*' (17 items). A total of 11 news items were about actions involving both '*corruption and irregularities*' and '*misconduct*.'

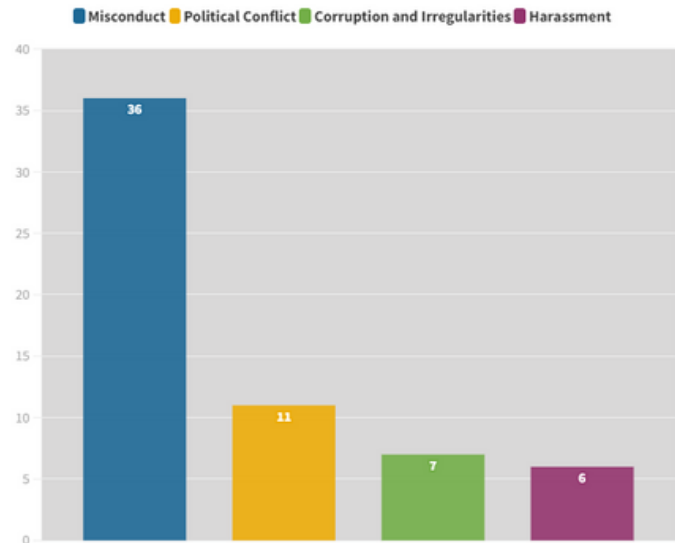
Majority of the news articles targeted by **judges** (20 items) covered reports of '*misconduct*.' (15 items) Also 8 report were related to '*corruption and irregularities*'. Besides, there were three news items which reported on both '*corruption and irregularities*' and '*misconduct*.'

Members of the parliament (16 items) primarily applied to remove news pieces on '*corruption and irregularities*' (10 items), '*misconduct*' (5 items) and '*assault and bodily harm*' (3 items). Three of these news reports covered both of these themes. The subject of one story was unknown.

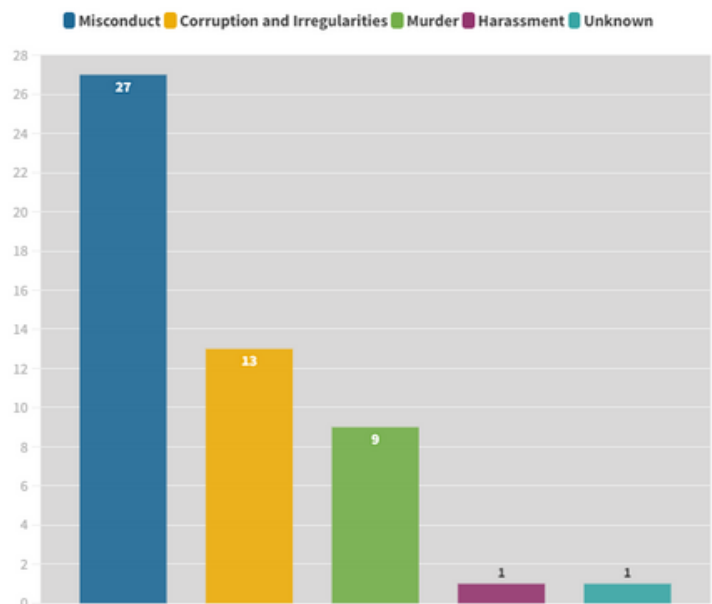
Bank executives (12 items) mainly filed content removal requests against news reports on '*corruption and irregularities*.'

The people in the position of **provincial police chief** filed a lawsuit for 12 news on '*corruption and irregularities*' and '*misconduct*' were intertwined.

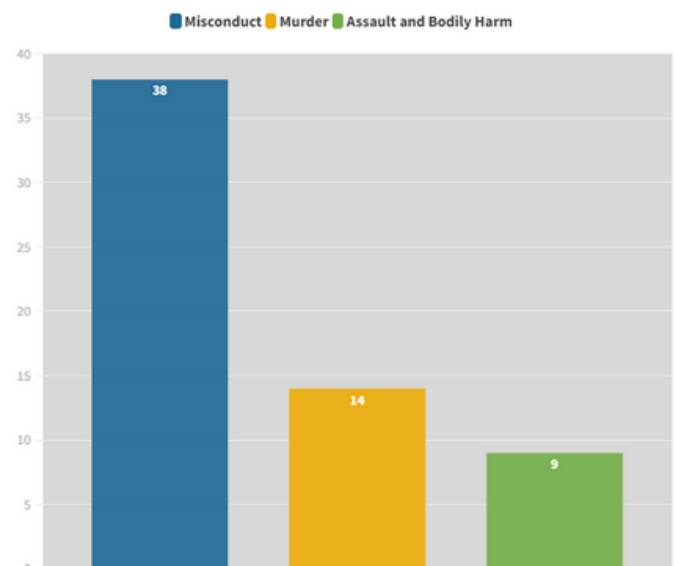
Distribution of News Topics Requested to be Taken Down by Senior Members of Political Parties



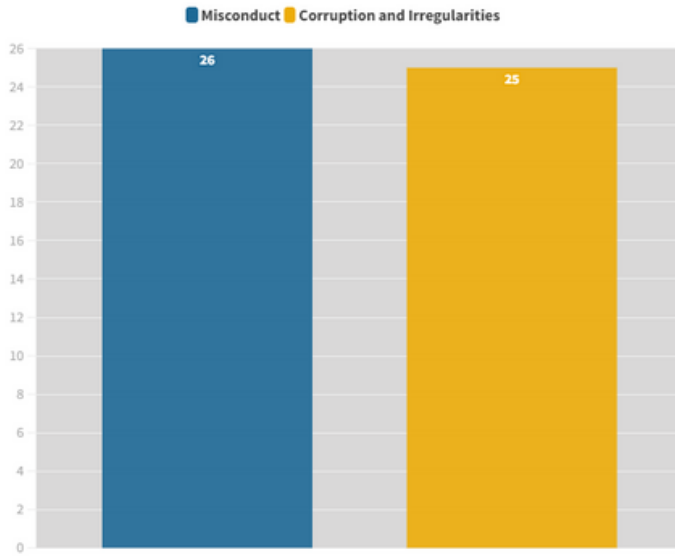
Distribution of News Topics Requested to be Taken Down by Academicians



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



Distribution of News Topics Requested to be Taken Down by Provincial Directors of National Education



Governors applied for a total of 12 'misconduct' reports to be taken off the air. *Corruption and irregularities* and 'misconduct' were intertwined in 1 context.

Majority of the news articles appealed by **senior military officials** (11 items) reported allegations of 'misconduct' (10 items). They also filed a claim for one report on 'corruption and irregularities'.

All of the news reports cited in content removal requests by **artists** (9 items) were reports of 'gambling', which is considered as a misdemeanor.

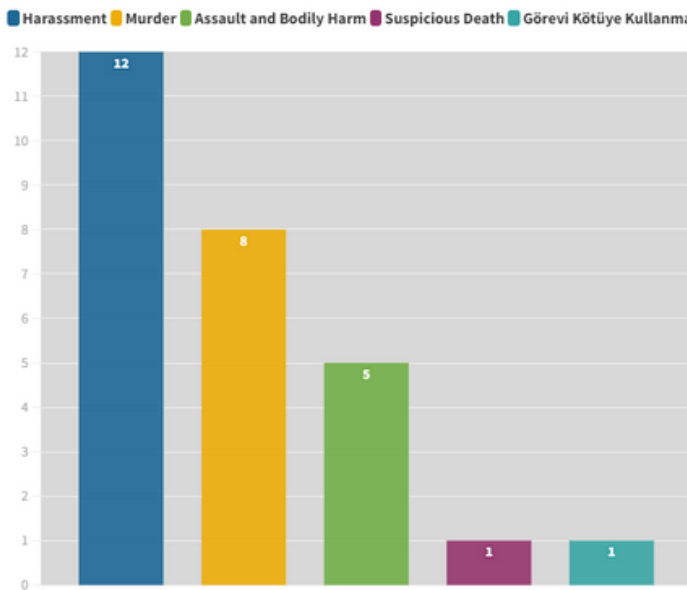
Deputy governors (7 items) placed content removal requests against news articles on 'misconduct' (6 items) and 'corruption and irregularities' (1 item).

Senior police officials applied for the removal of a total 6 contents. All news reports intertwined with topic of 'corruption and irregularities' and 'misconduct'.

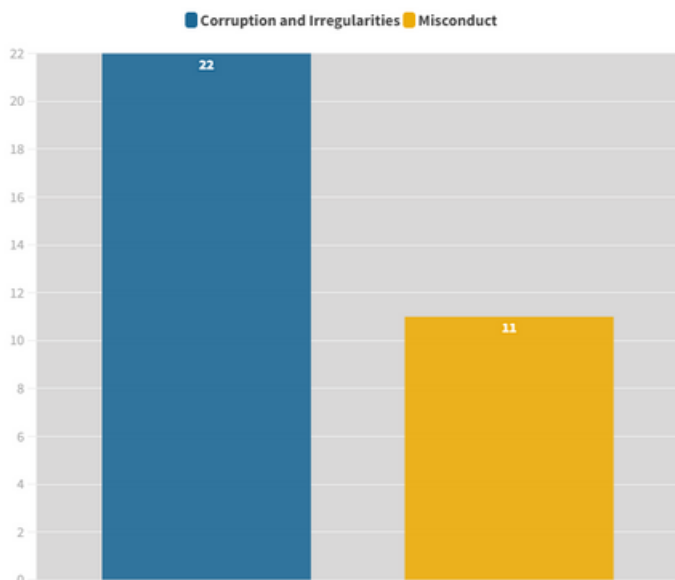
In total, **doctors** applied for four news which contained 'misconduct' to be taken down. The **soldiers** filed a lawsuit to remove four news which contain topic of 'corruption-irregularities' and 'misconduct' were intertwined.

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.'

Distribution of News Topics Requested to be Taken Down by Defendants



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

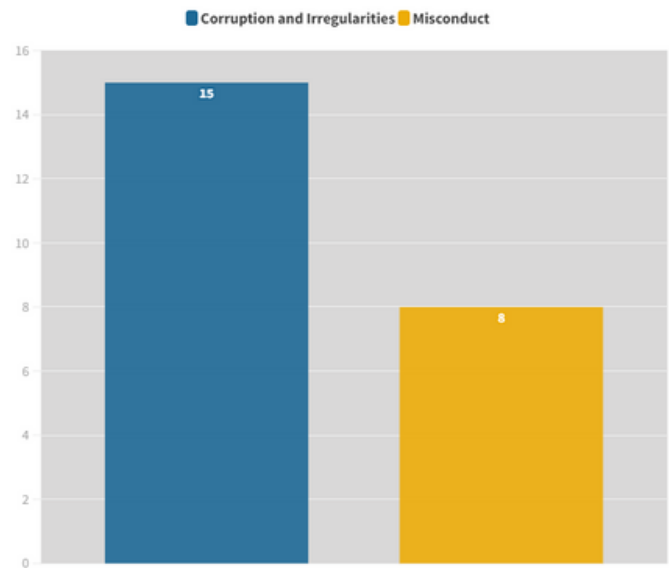


Universities (3 items), which are legal entities, filed content removal requests against news articles on 'misconduct' and 'corruption and irregularities'. The subject of a one news was unknown. The **gendarmerie** filed a claim to remove 3 reports of 'misconduct'.

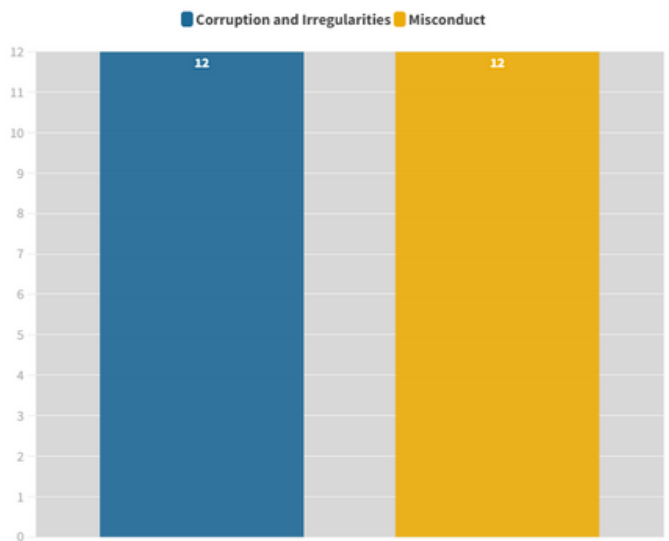
All of the news articles that were appealed by **civil servants** (3 items) covered misconduct reports. Two **bureaucrats** sued for removal of news that about on 'misconduct'.

Content removal requests placed by **deputy prosecutor** (1 item), **chief physician** (1 item) were reports of 'misconduct'. A foundation applied for a removal of news about 'corruption and irregularities'. It was understood that a one police officer was suing to remove a news of about 'harassment'.

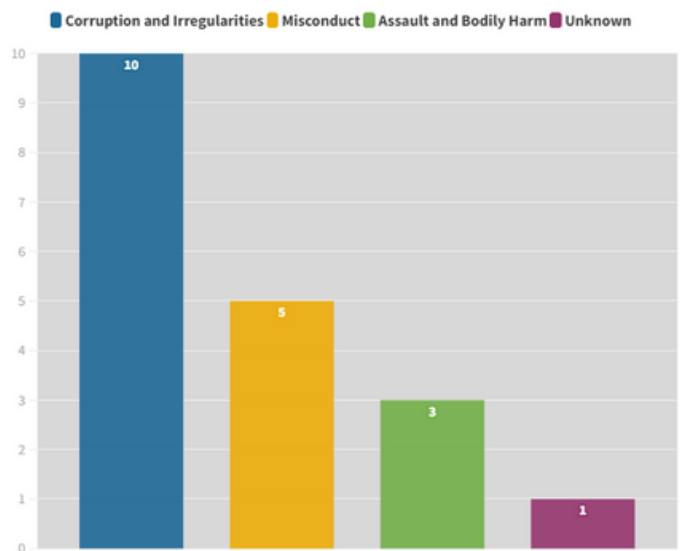
Distribution of News Topics Requested to be Taken Down by Judges



Distribution of News Topics Requested to be Taken Down by Provincial Police Chfs



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



RECIPIENTS OF CONTENT REMOVAL REQUESTS

In the scope of this research, a total of 36 news outlets were monitored. There organizations can be listed as follows in alphabetical order: ABC Newspaper, Artı Gerçek, BBC Turkish, BIANET, Birgün Daily, Cumhuriyet, dokuz8NEWS, Gazette Duvar, DW Turkish, Evrensel Daily, Fox TV, Gazette Fersude, Gazette Kolektif, Gazette Manifesto, Gazette Yolculuk, Gerçek Gündem, Halk TV, İleri News, Karar Newspaper, Medyascope, ODA TV, P24, Sendika.org, SoL News, Sözcü Newspaper, Sputnik Turkey, Susma Platform, T24, TELE1, Tükenmez News, Umut Newspaper, Yeni Yaşam, Yeni1Mecra, Yeniçağ Newspaper, Yurt Newspaper, 140Journos.

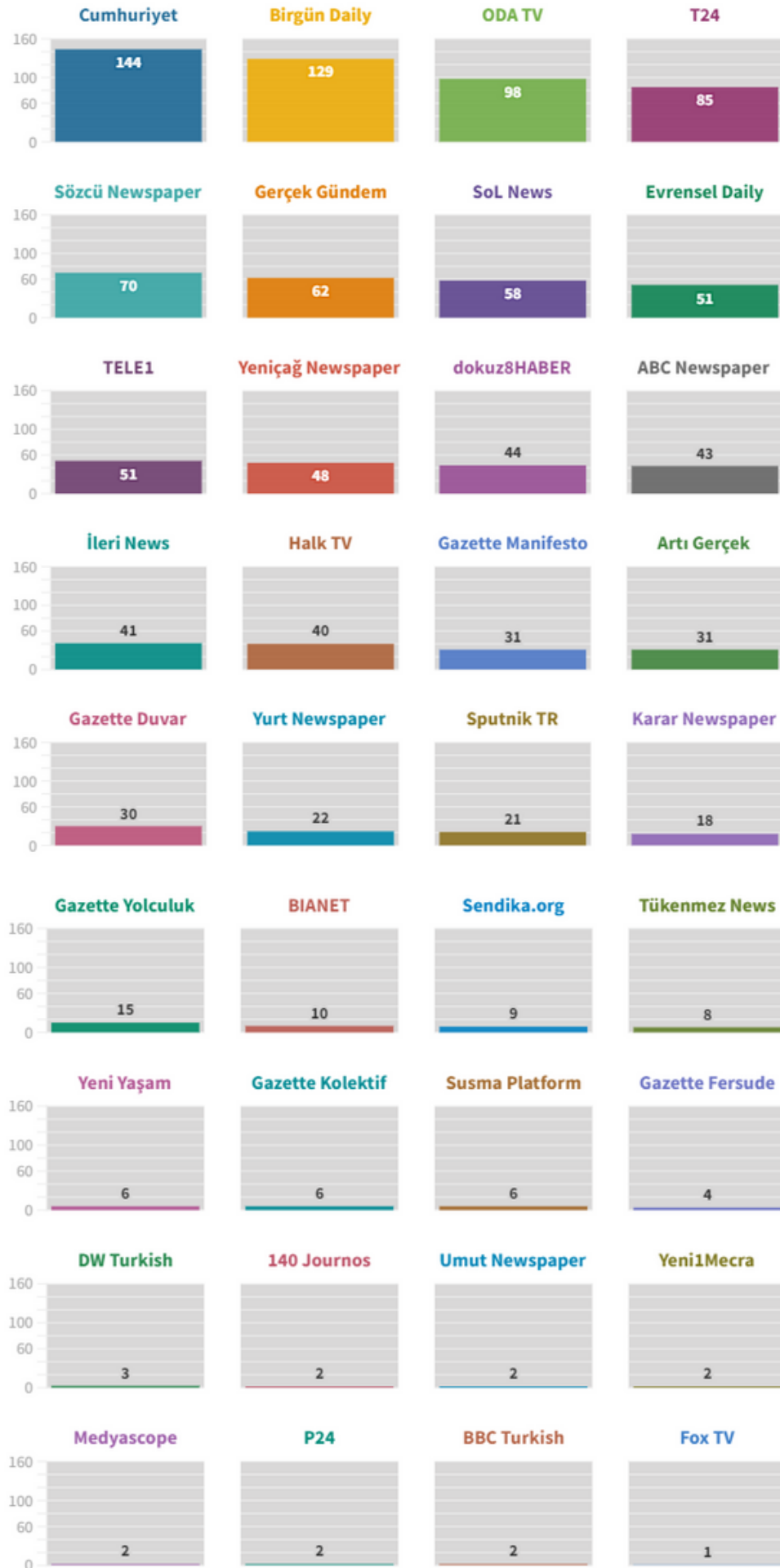
Cumhuriyet, the official website of daily **Cumhuriyet**, received by far the highest number of content removal orders (144 items) during the time period covered by this research. It was followed by **BirGün Daily** (129 items), **ODA TV** (98 items), **T24** (85 items), **Sözcü Newspaper** (70 items), **Gerçek Gündem** (62 items), **SoL News** (58 items), **TELE1** (51 items), **Evrensel Daily** (51 items),

The following news organizations received 20 to 50 content removal orders during the same period: **Yeniçağ Newspaper** (48 items), **dokuz8NEWS** (44 items), **ABC Newspaper** (43 items), **İleri News** (41 items), **Halk TV** (40 items), **Gazette Manifesto** (31 items), **Artı Gerçek** (31 items), **Gazette Duvar** (30 items), **Yurt Newspaper** (22 items), **Sputnik Turkey** (21 items).

Among the news outlets which received less than 20 content removal orders during the same period: **Karar Newspaper** (18 items), **Gazette Yolculuk** (15 items), **BIANET** (10 items), **Sendika.org** (9 items), **Tükenmez News** (8 items), **Susma Platform** (6 items), **Yeni Yaşam** (6 items), **Gazette Kolektif** (6 items), **Gazette Fersude** (4 items), **DW Turkish** (3 items), **Yeni1Mecra** (2 item), **Medyascope** (2 item), **Umut Newspaper** (2 items) **P24** (2 items), **BBC Turkish** (2 item), **140Journos** (2 item), **Fox TV** (1 item),



Distribution of Recipients



5.1 Cumhuriyet

Distribution of News Topics Requested to be Taken Down



The primary theme of these news reports was ‘*corruption and irregularities*’ (84 items), followed by ‘*misconduct*’ (55 items), ‘*murder*’ (11 items), and ‘*political conflict*’ (10 items).

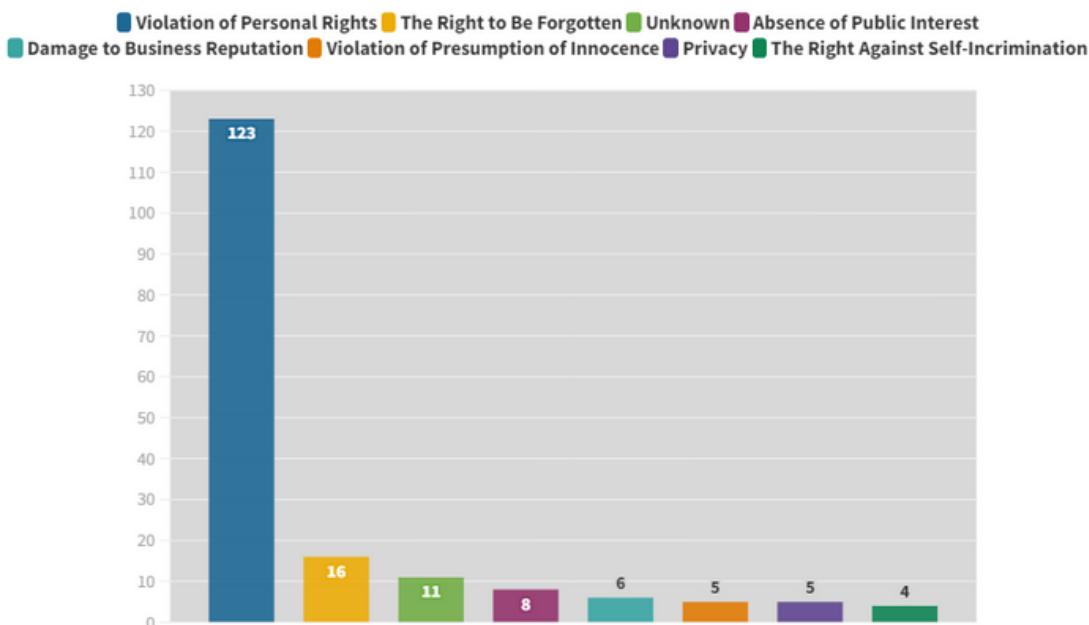
During the time period covered by this research, Cumhuriyet daily received content removal requests for 144 news pieces.

In this context, the organization became the top recipient of content removal requests in the scope of this research

‘*Corruption and irregularities*’ and ‘*misconduct*’ were cited concurrently in 29 news reports.

In this cluster, the majority of the requests came from **business people** (7 items).

Justifications for Content Removal Requests



The topic of ‘*corruption and irregularities*’ was seen in two news reports along with ‘*fraud*’ and ‘*political conflict*’. In the three news, the topic of ‘*misconduct*’ and ‘*murder*’ were intertwined. In addition to that one news covered both ‘*misconduct*’ and ‘*harassment*’.

The outstanding majority of the content removal requests against Cumhuriyet were based on *'violation of personal rights'* (123 items). Other cited justifications include the *'right to be forgotten'* (16 items) and *'absence of public interest'* (8 items).

Furthermore, several content removal requests were based on multiple justifications: e.g., *'violation of personal rights'* and *'absence of public interest'* (8 items); *violation of personal rights* and *'right against*

self-incrimination' (4 items); *'violation of personal rights'* and *'right to be forgotten'* (8 items); *'violation of personal rights'* and *'privacy'* (3 items); *'violation of personal rights'* and *'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'*.

The majority of the requests submitted to Cumhuriyet were placed by **business people** (29 items), followed by **senior bureaucrats** (13 items) and **ministers** (9 items).

The news articles targeted by **business people** were primarily reports of *'corruption and irregularities'* (23 items) and *'misconduct'* (9 items).

Seven 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.

In addition to the *'absence of public interest'* and *'violation of presumption of innocence'* were accompanied in two cases.

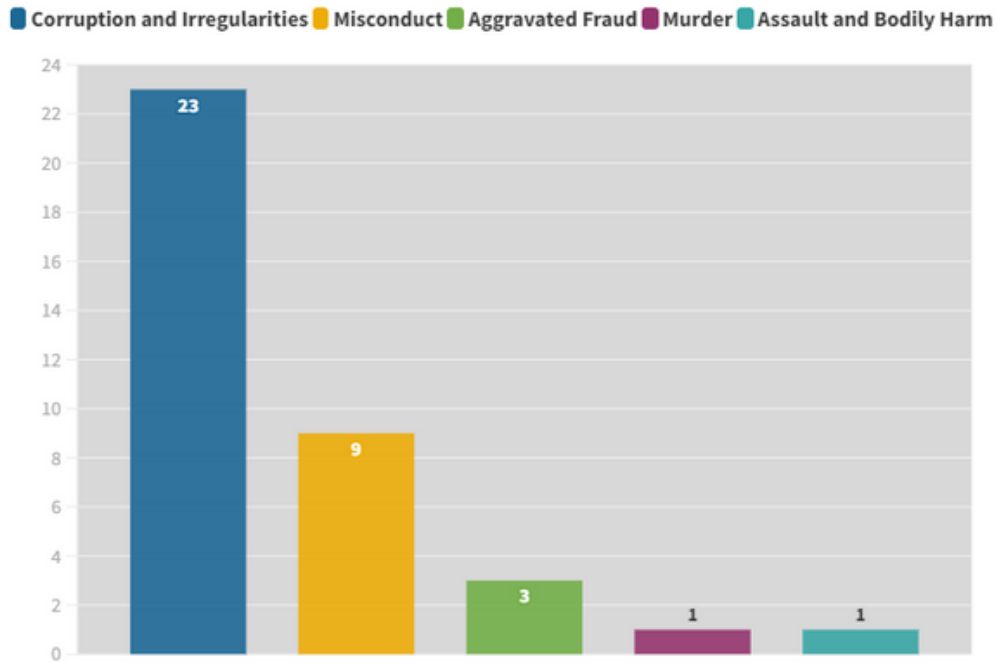
Out of nine content removal requests placed by **ministers**, two were reports of both *'corruption and irregularities'* and *'misconduct'*, and one article only reported allegations of *'misconduct'*.

The other six news reports were about *'political conflict'*. All of the removal requests were based on *'violation of personal rights'*.

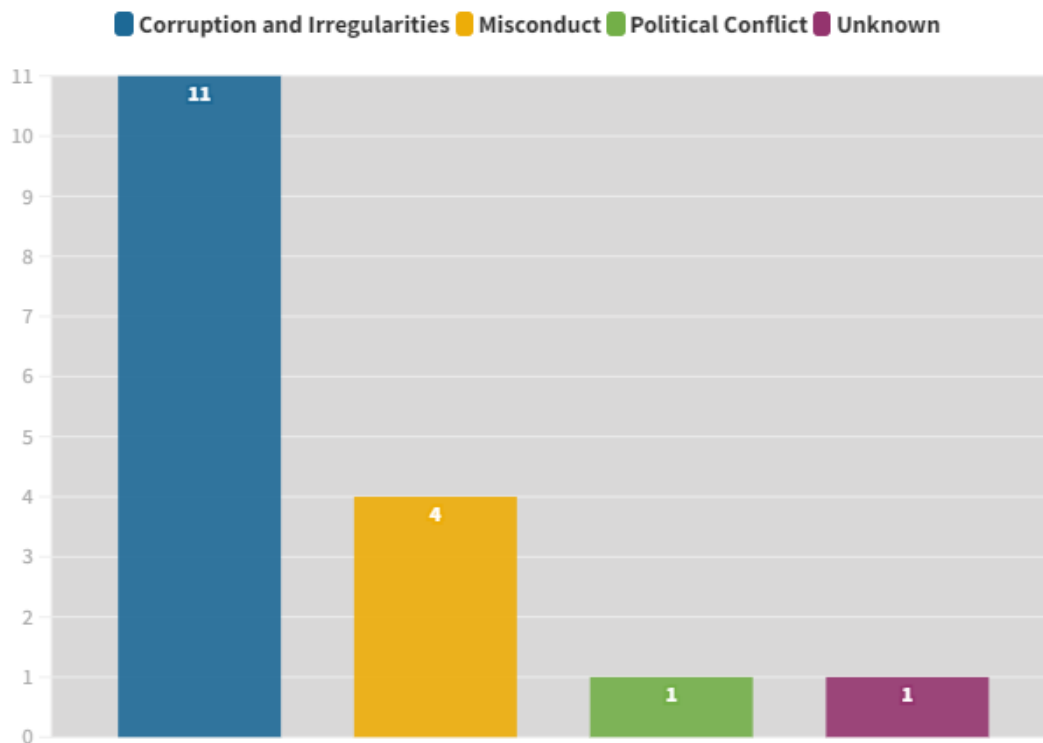
Vocational Positions of Complainants



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



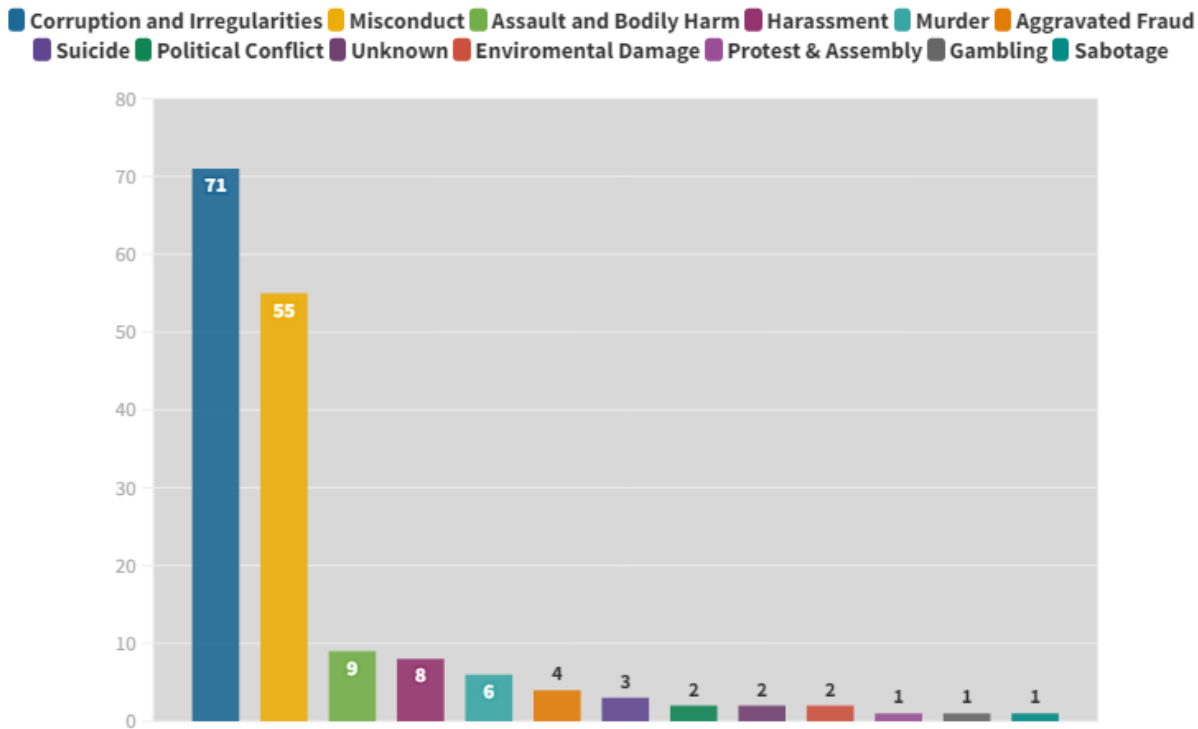
Distribution of News Topics Requested to be Taken Down by Senior Bureaucrats



13 content removal requests were placed by **senior bureaucrats**. Out of 13 contents, 11 were about '*corruption and irregularities*', 4 were on '*misconduct*' 1 was '*political conflict*'. The subject of one news piece could not be classified. In addition, it should be said that the subject of '*corruption and irregularities*' and '*misconduct*' were intertwined in 4 contents. Eleven of the removal decisions were taken on the grounds of '*violation of personal rights*', 2 were on the grounds of '*right to be forgotten*' and 2 were on the grounds of '*violation of the presumption of innocence*'.

5.2 BirGün Daily

Distribution of News Topics Requested to be Taken Down

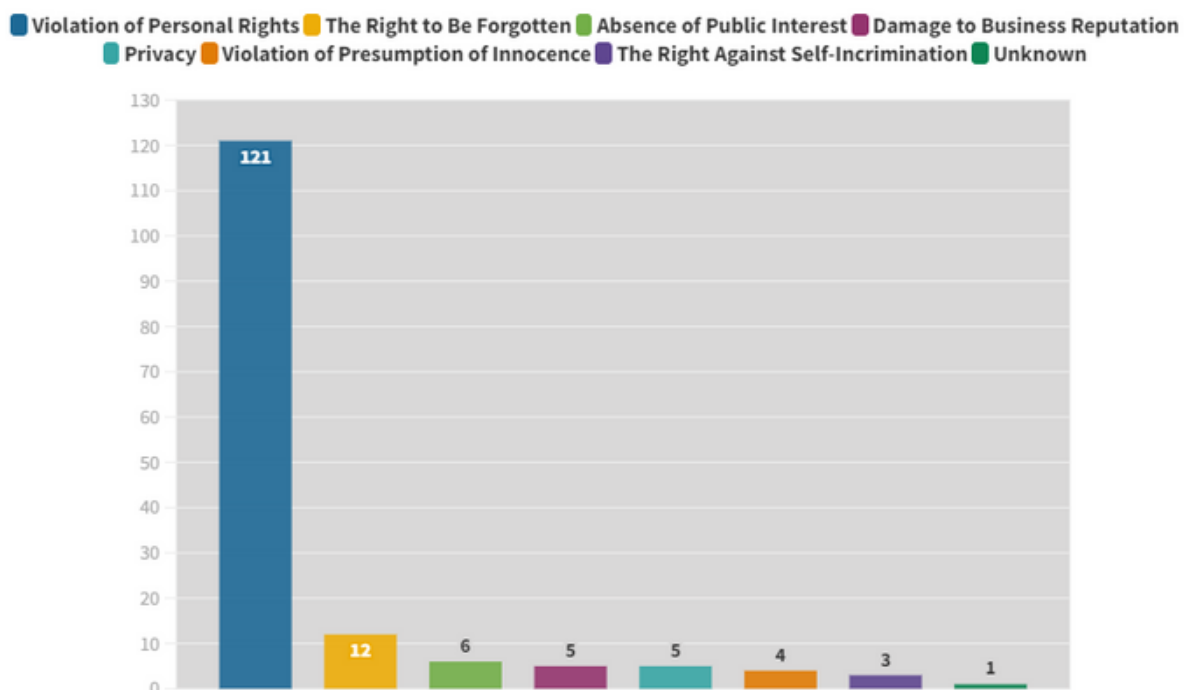


According to our research, a total of 129 orders were placed to take down news reports published by the online portal of BirGün daily.

Therefore, BirGün Daily is in the second place in terms of the number of content removal requests received during the research period.

The news reports published by this outlet mainly covered allegations of ‘*corruption and irregularities*’ (71 items), ‘*misconduct*’ (55 items) and ‘*assault and bodily harm*’ (9 items). In addition, 23 news pieces covered both ‘*corruption and irregularities*’ and ‘*misconduct*’. The majority of the complainants against these news reports were **provincial directors of national education** (5 items). 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).

Justifications for Content Removal Requests



These requests often cited '*violation of personal rights*' (121 items). It was followed by the '*right to be forgotten*' (12 items). Besides, five 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 **business people** (18 items) and **senior bureaucrats** (16 items).

The majority of the complainants who placed content removal requests against BirGün were **business people** (19 items), **senior bureaucrats** (17 items) and **companies** (10 items).

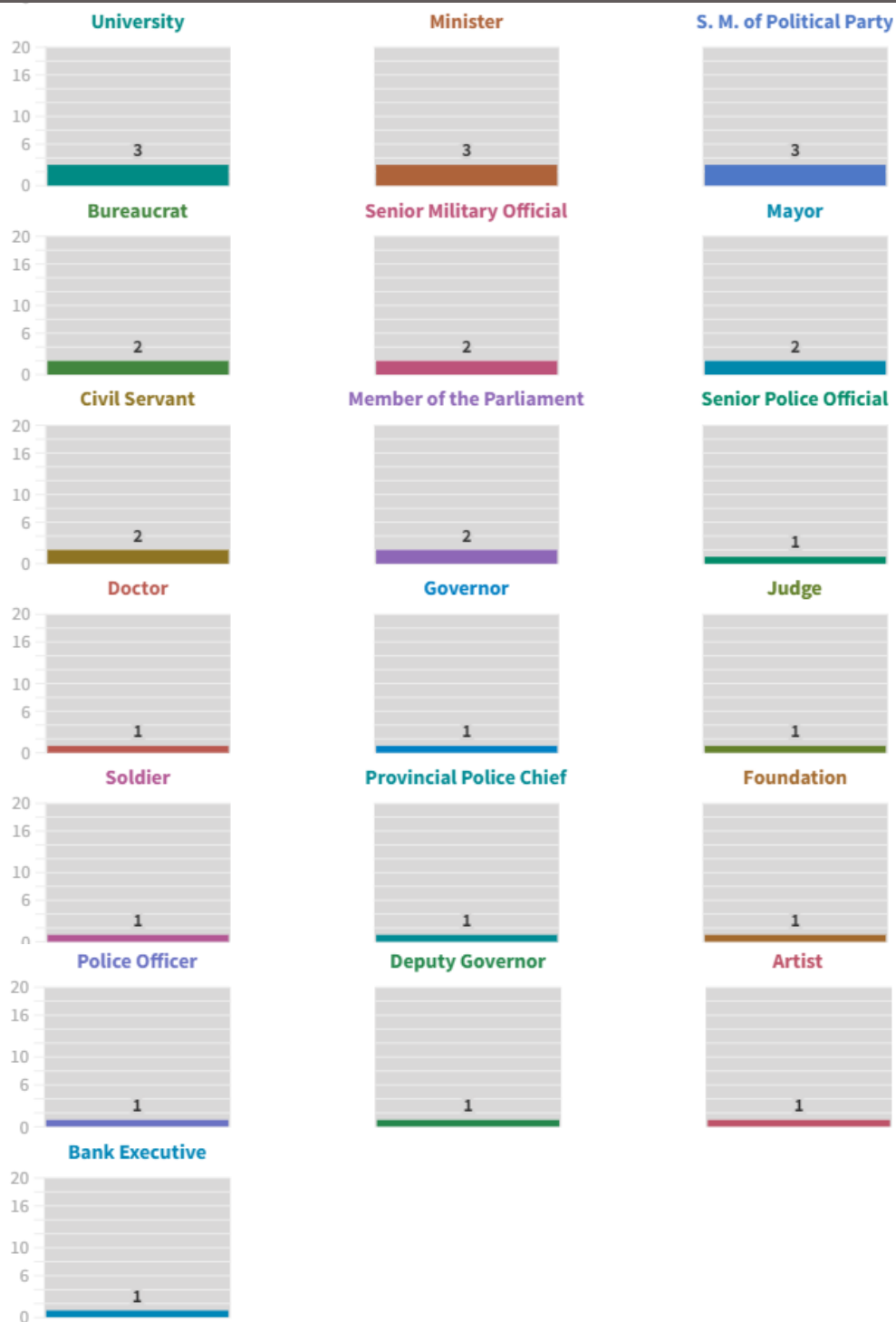
Out of nineteen content removal orders placed by **business people**, thirteen were filed against news reports citing '*corruption and irregularities*'.

On the other side, three news reports were about actions involving both '*corruption and irregularities*' and '*misconduct*.' It must be noted that majority of the content removal requests filed by this group were based on '*violation of personal rights*' (18 items).

Senior bureaucrats (17 items) were the second biggest group to file for content removal orders against BirGün, and out of these items, 14 were reports of '*corruption and irregularities*' and 5 reported allegations of '*misconduct*'. In the three reports, these two topic intersected and the justification for '*violation of personal rights*' (16 items) was instrumental in making the decisions.

Vocational Positions of Complainants

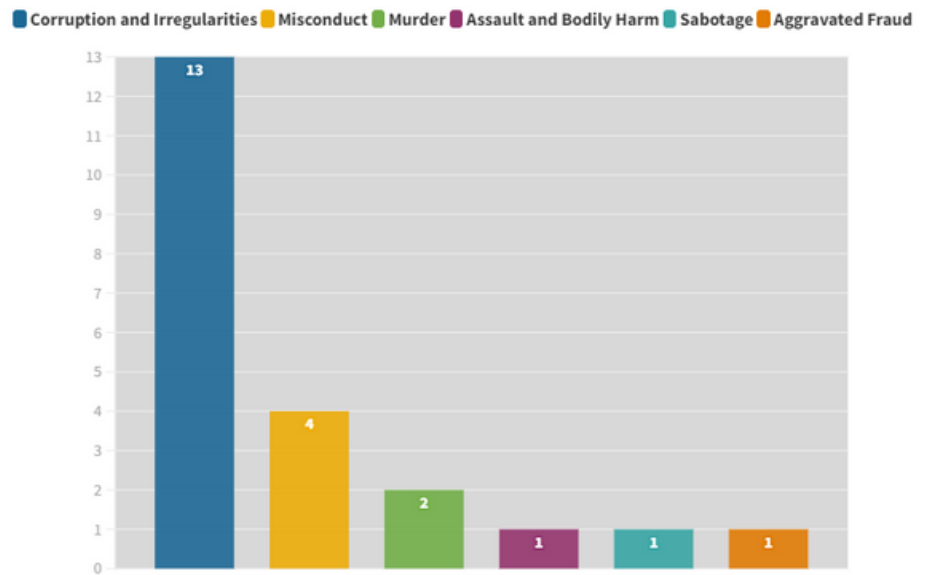




Companies (10 items), the third group, exclusively targeted news reports about '*corruption and irregularities*' (8 items) which was cited concurrently in 2 news pieces with topic of '*political conflict*'

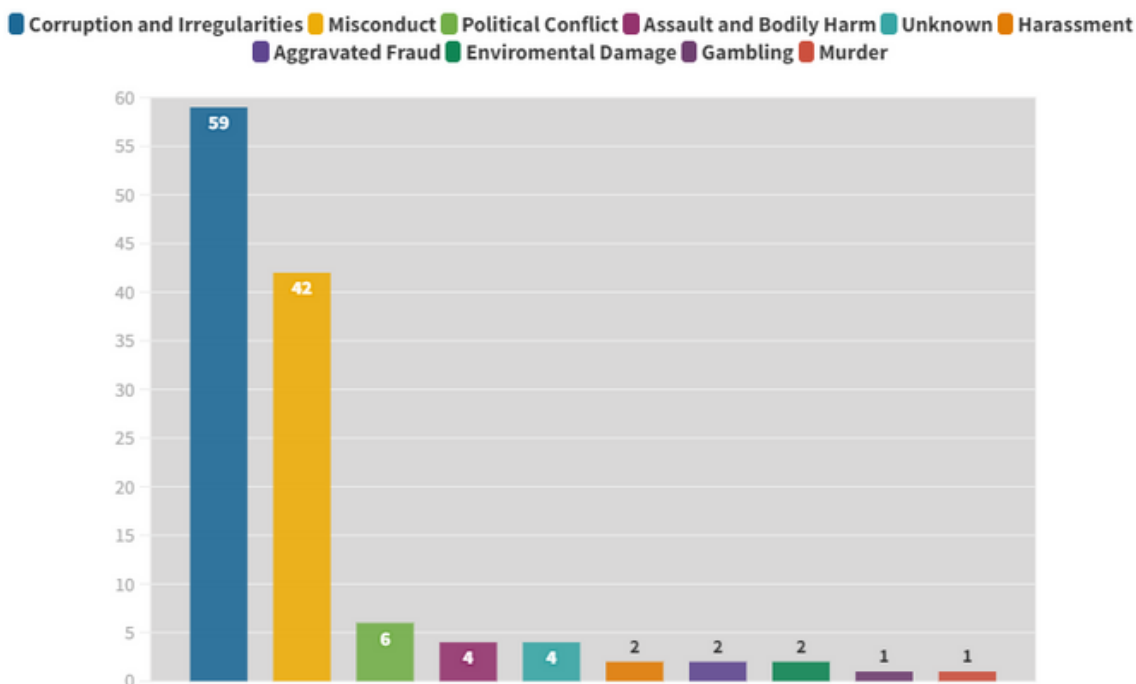
In addition, **companies** filed a claim to remove the news on 2 '*environmental damage*' and 1 '*fraud*'.

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



5.3 ODA TV

Distribution of News Topics Requested to be Taken Down



With 98 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).

Most of the news items cited in these orders were reports of '*corruption and irregularities*' (59 items), '*misconduct*' (42 items) and '*political conflict*' (6 items). It should also be noted that out of 98 items, 24 reported allegations of both '*corruption and irregularities*' and '*misconduct*'.

The complainants against these reports were: **Mayors** (11 items), **business people** (3 items), **provincial director of national education** (2 items), **prosecutors** (2 items), **senior bureaucrats** (1 item), **ministers** (1 item), **governors** (1 items), **members of the parliament** (1 item)

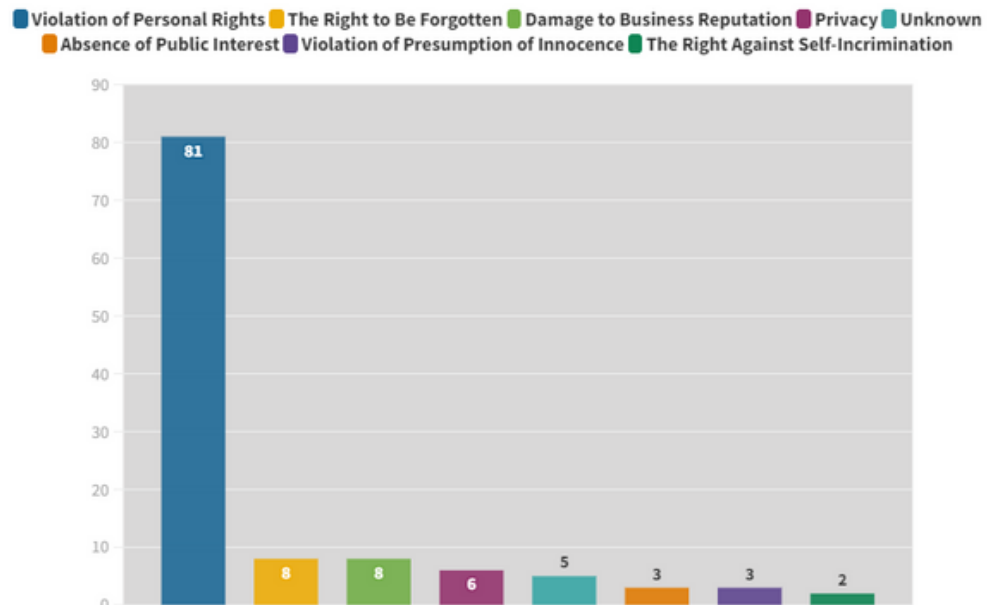
The majority of the takedown orders were based on 'violation of personal rights' (81 items), followed by 'damage to business reputation' (8 items) and 'right to be forgotten' (8 items)

It is notable that the majority of the complainants against ODA TV were **business people** (19 items).

The other complainants include **mayors** (12 items), **companies** (7 items) and **lawyers** (7 items).

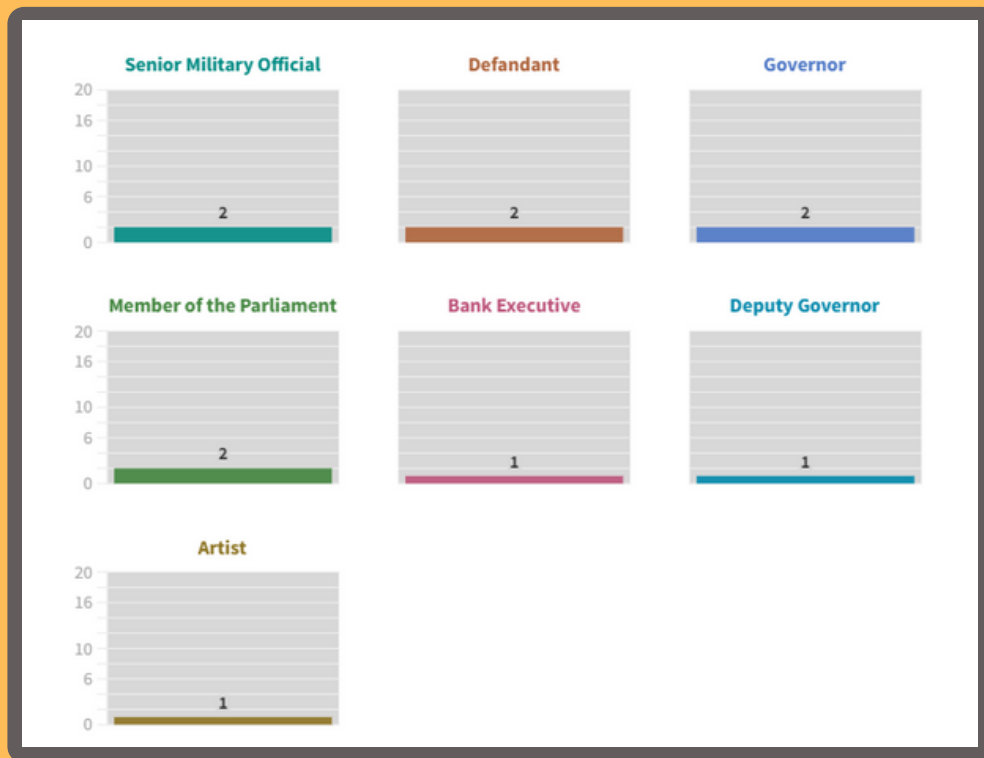
Out of the 12 news pieces targeted by **mayors**, 11 were reports of 'corruption and irregularities' and 'misconduct', and all of these takedown orders were based on 'violation of personal rights'.

Justifications for Content Removal Requests



Vocational Positions of Complainants

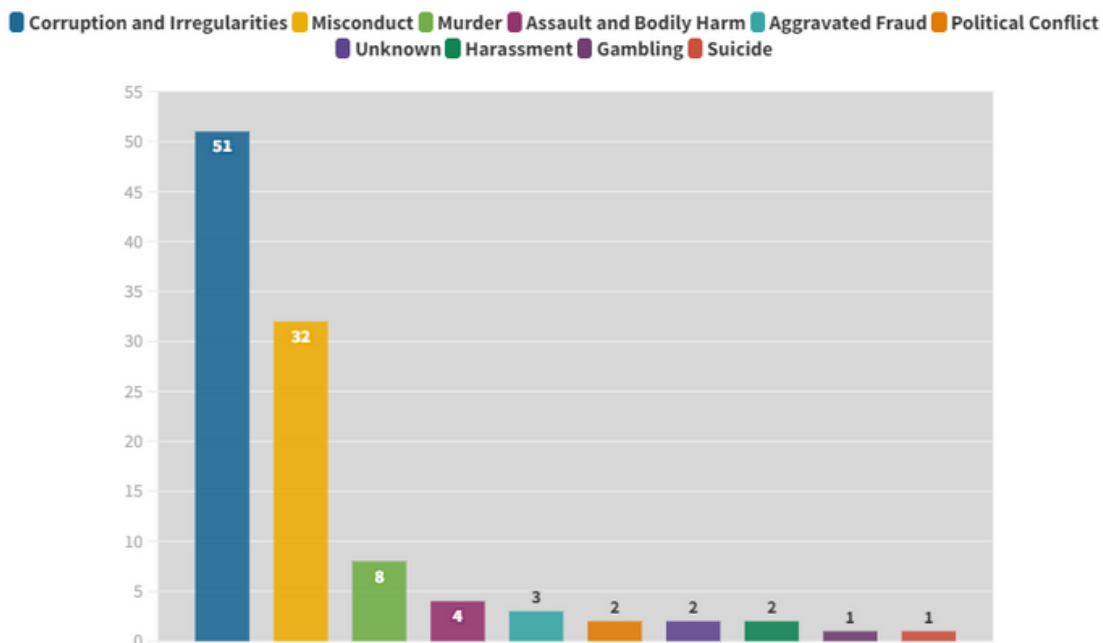




There were removal requests for 7 news pieces, all of which were reports of ‘*corruption and irregularities*’, and these requests were placed by **companies** on the grounds of ‘*damage to business reputation*’. The news reports which targeted by **civilians** (5 items) were primarily related to incidents involving ‘*assault and bodily harm*’ (3 items). The majority of the content removal orders on these news articles were based on ‘*privacy*’ (3 items).

5.4 T24

Distribution of News Topics Requested to be Taken Down



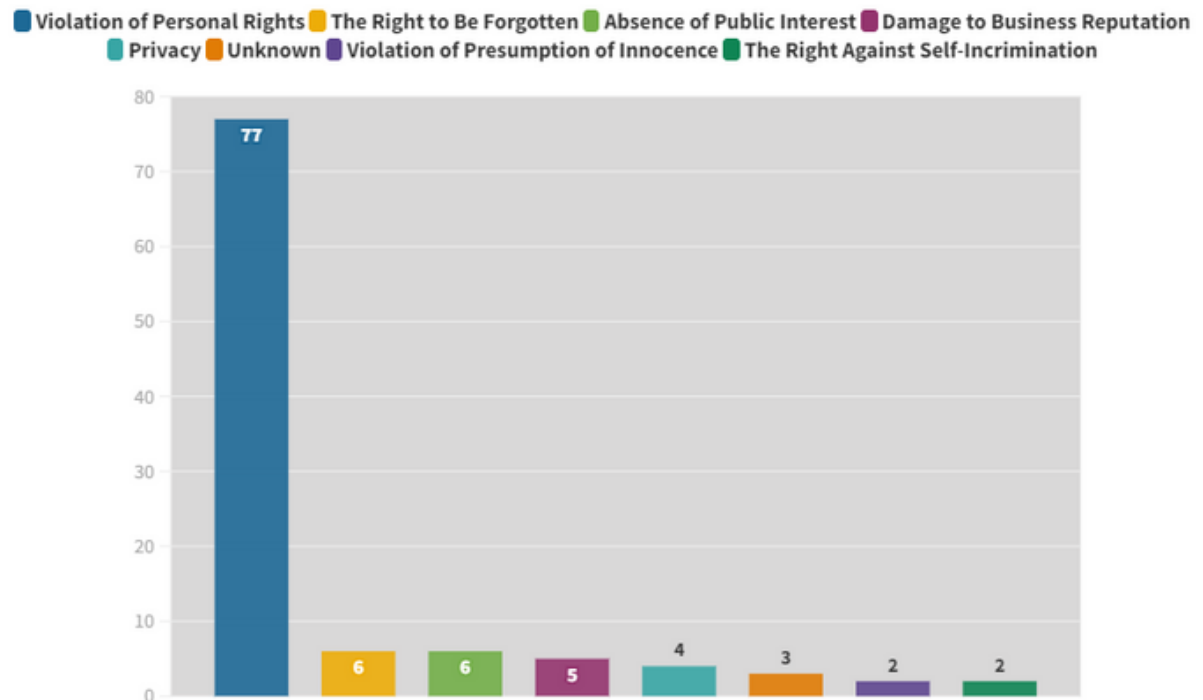
In our research, 85 takedown orders were issued for the news content published by T24, a digital news outlet.

In this context, T24 was in the fourth place in terms of the number of issued content removal requests. 51 out of these 85 orders targeted news reports on ‘*corruption and irregularities*’, followed by ‘*misconduct*’ (32 items) and ‘*murder*’ (8 items).

Besides, 18 news reports included allegations on 'corruption and irregularities' in addition to 'misconduct'.

For 4 out of these 18 stories were provincial directors of national education who request content removal

Justifications for Content Removal Requests



The majority of the takedown orders issued against T24 were based on 'violation of personal rights' (77 items), followed by 'absence of public interest' (6 items), 'right to be forgotten' (6 items), 'damage to business reputation' (5 items) and 'privacy' (4 items).

The complainants who placed takedown requests against the news outlet are: **Business people** (20 items), **companies** (7 items), civilian (6 items), **lawyers** (5 items), **ministers** (5 items), **senior bureaucrats** (5 items).

It was worth noting that **business people** were at the center of three of the eight reports on 'murder' and that the same group was the subject of 13 of the 51 contents on 'corruption and irregularities'. In addition, all 20 reports related to the group in question were subject to an order to take them off the air, citing a 'violation of their 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'.

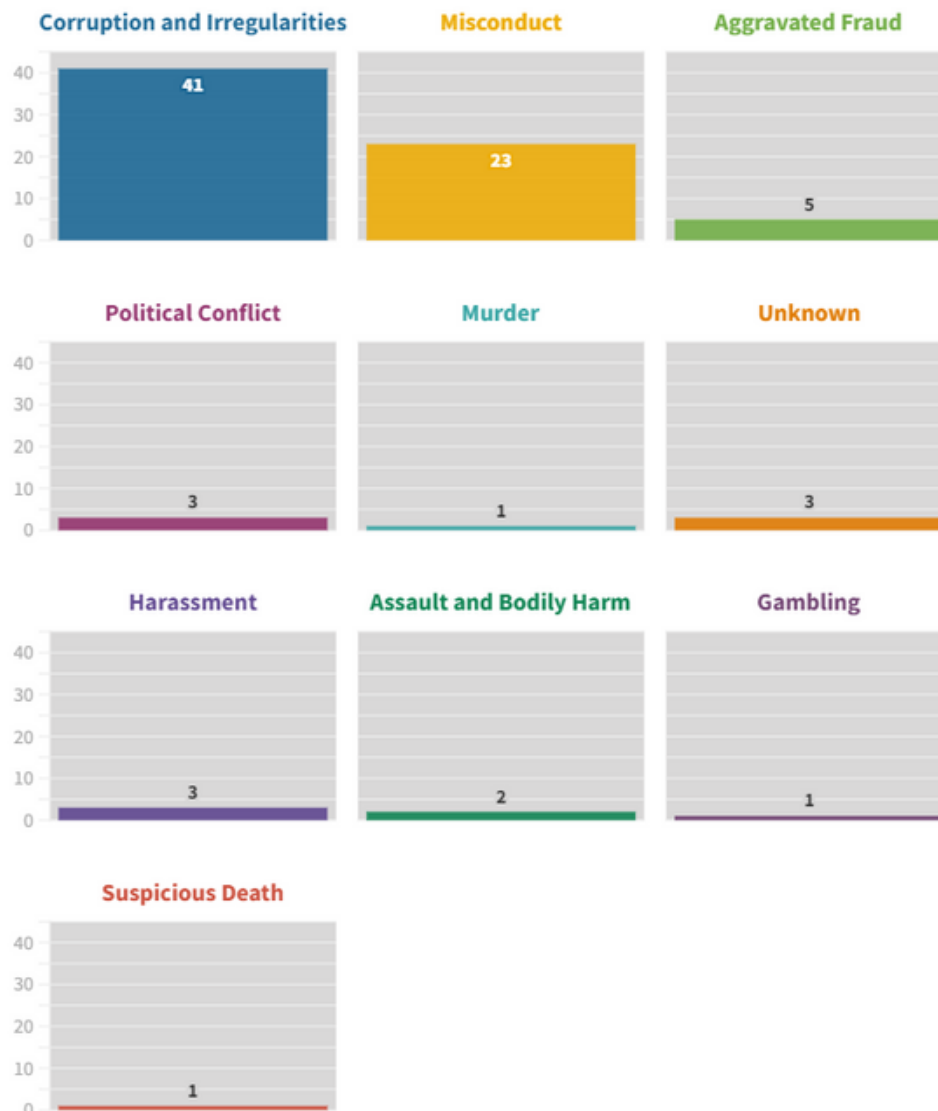
All 7 contents, including **companies**, were on 'corruption and irregularities'. There were five removal requests placed by **lawyers**, including four news reports on 'corruption and irregularities' and one article about 'misconduct'.

Vocational Positions of Complainants



5.5 Sözcü Newspaper

Distribution of News Topics Requested to be Taken Down

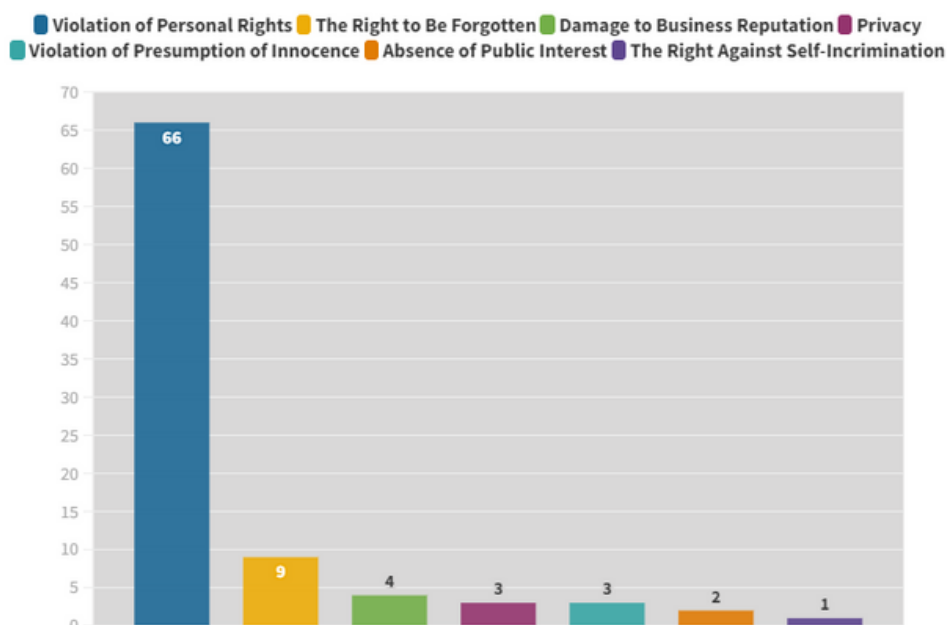


There were 70 takedown orders issued against the news reports published on the website of Sözcü Newspaper. The majority of these orders were placed to take down news reports on ‘*corruption and irregularities*’ (41 items) and ‘*misconduct*’ (23 items).

Nine news items reported allegations of ‘*corruption and irregularities*’ accompanied by ‘*misconduct*’, including three news articles involving **senior bureaucrats**. 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*’ (66 items), followed by the ‘*right to be forgotten*’ (9 items), ‘*damage to business reputation*’ (4 items) and ‘*privacy*’ (3 items).

Justifications for Content Removal Requests



Furthermore, an outstanding majority of the complainants were **senior bureaucrats** (13 items) and **civilians** (8 items).

Two out of seven news reports about **senior members of political parties** featured allegations of both 'misconduct' and 'harassment'. Besides, 5 news reports were about 'misconduct', one reported claims of 'corruption and irregularities' and last one was about 'political conflict'. The takedown orders were placed solely on the basis of 'violation of personal rights'.

13 reports about **senior bureaucrats** featured allegations of 'corruption and irregularities'; however, three of these reports also included elements involving 'misconduct'.

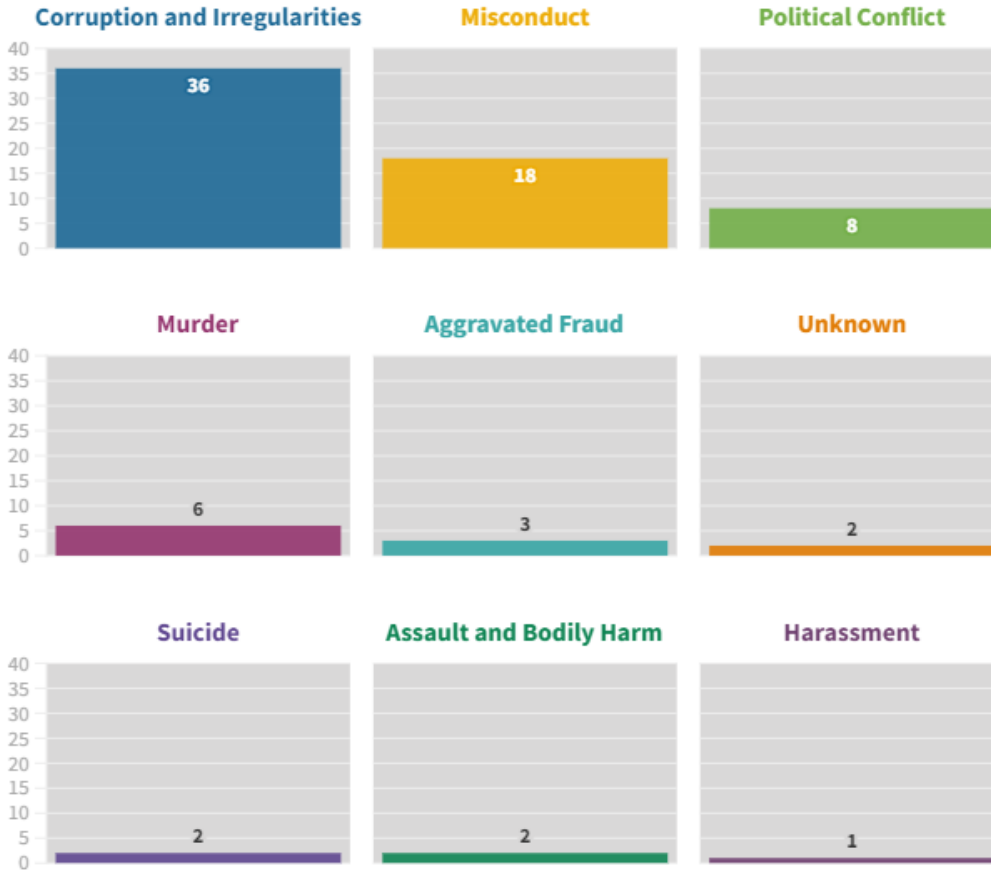
The takedown orders were often based on an alleged 'violation of personal rights' (11 items).

Vocational Positions of Complainants



5.6 Gerçek Gündem

Distribution of News Topics Requested to be Taken Down



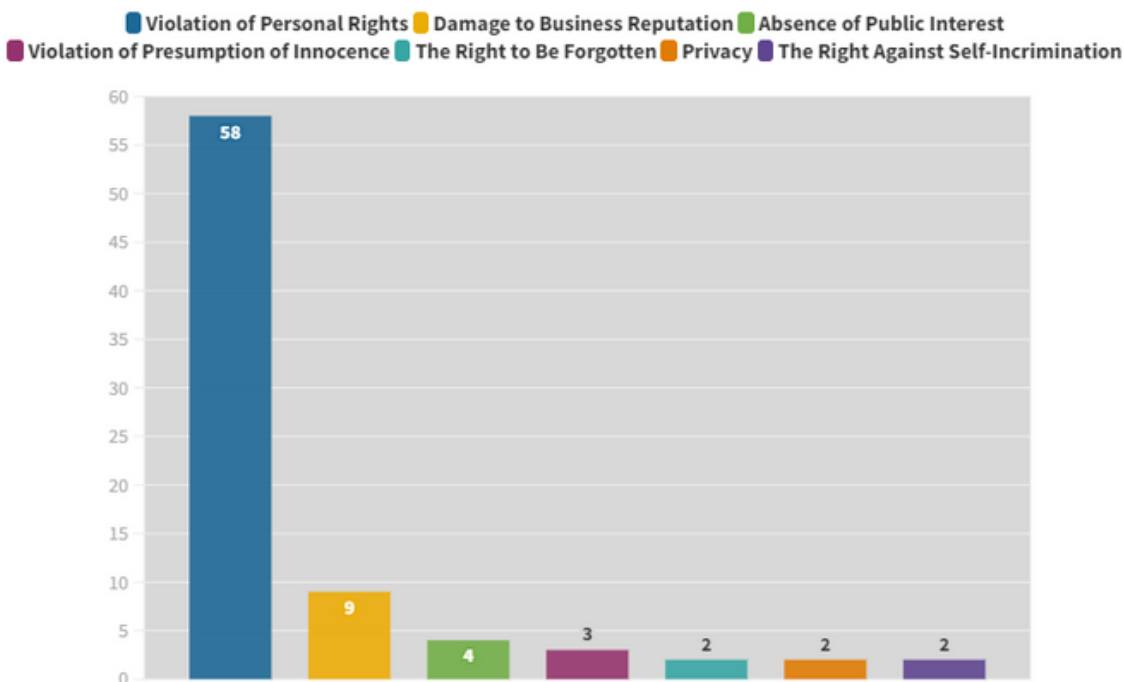
Gerçek Gündem was in the sixth place among the news outlets which were often targeted by content removal orders.

The online news portal received 62 orders to remove content, the majority of which were reports about 'corruption and irregularities' (36 items), 'misconduct' (18 items) and 'political conflict' (8 items).

In total, the topics of 'corruption and irregularities' and 'political conflict' were intertwined in six contents.

In addition to that there were five news items which reported on both 'corruption and irregularities' and 'misconduct'. One news article reported 'harassment' in addition to 'misconduct'.

Justifications for Content Removal Requests



The majority of these requests cited '*violation of personal rights*' (58 items). This justification was primarily mentioned in the requests placed by **business people** (16 items), followed by **companies** (12 items).

Furthermore, the significant majority of the takedown requests against Gerçek Gündem came from **business people** (16 items), followed by **companies** (12 items), **lawyers** (6 items), **district governors** (4 items) and **ministers** (4 items).

Besides, the majority of the actors in the news reports about allegations of '*corruption and irregularities*' were also **companies** (12 items).

On the other hand, the perpetrators in news reports involving '*misconduct*' were **deputy governors** (4 items), **business people** (2 items) and **senior bureaucrats** (2 items).

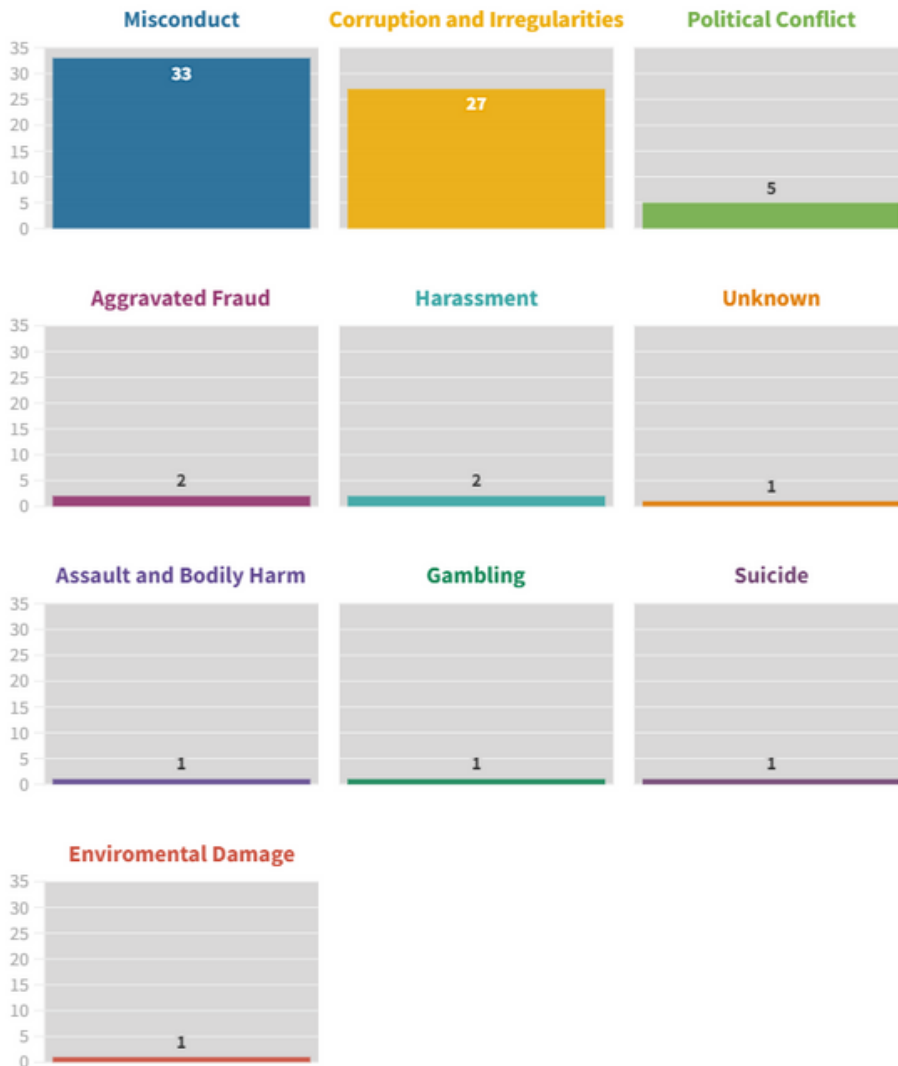
Two news reports about **senior bureaucrats** included allegations of '*corruption and irregularities*' accompanied by '*misconduct*', while one news article about a **senior member of a political party** reported both '*misconduct*' and '*harassment*'.

Vocational Positions of Complainants

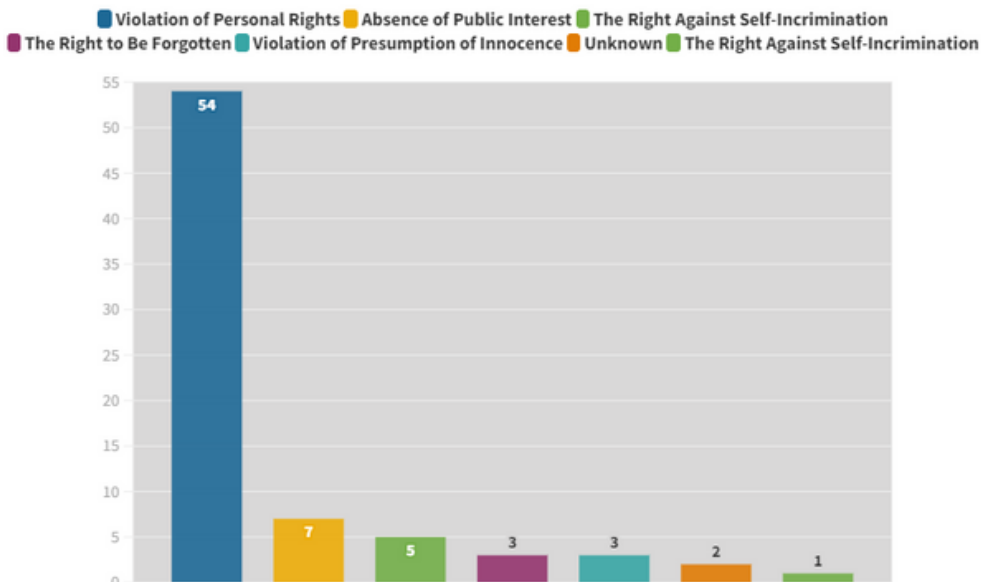


5.7 SoL News

Distribution of News Topics Requested to be Taken Down



Justifications for Content Removal Requests



With 58 content removal requests, SoL News, an online news portal, was in the 7th place among the news outlets in the scope of this research.

In this context, the outlet received 33 requests against news reports on ‘*corruption and irregularities*’ and 27 requests against news items on ‘*misconduct*’

54 out of 58 takedown requests were based on ‘*violation of personal rights*’. 9 requests were placed by **lawyers**, 7 were placed by **business people**, 6 were placed by **ministers**.

Seven requests cited ‘*absence of public interest*’ in addition to ‘*violation of personal rights*’. These 7 requests were placed by **lawyers** (3 items) and **district governors** (2 items).

The complainants who placed content removal requests against SoL Haber can be listed as follows: **Lawyers** (9 items), **business people** (7 items), **ministers** (6 items) and **senior bureaucrats** (6 items).

The majority of the complainants against news reports on '*corruption and irregularities*' were **business people** (6 items) and **senior bureaucrats** (6 items) while the majority of the takedown requests against news articles on '*misconduct*' were placed by **ministers** (5 items) and **senior bureaucrats** (4 items).

10 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

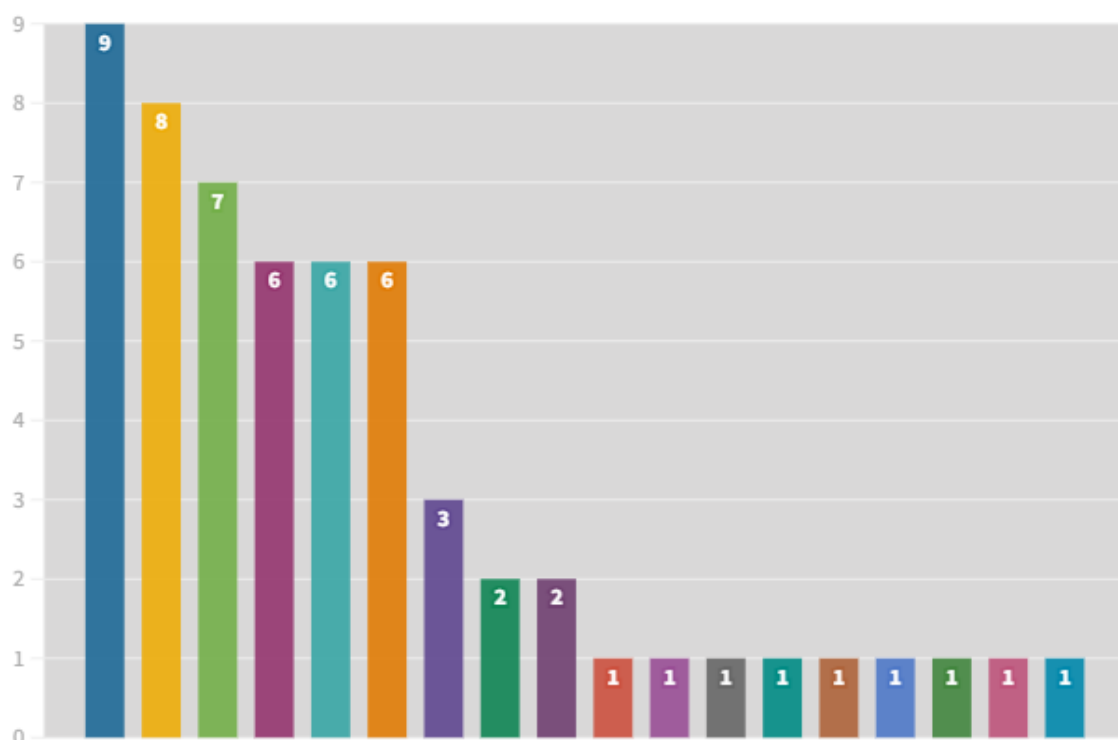
two were targeted by **ministers**. The three reports were intertwined '*corruption and irregularities*' and '*political conflict*'. **Companies** were the plaintiffs of all three. One of these news articles reported both '*harassment*' and '*misconduct*'.

5 out of 9 news reports involving **lawyers** were about '*corruption and irregularities*' and the remaining four 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*'.

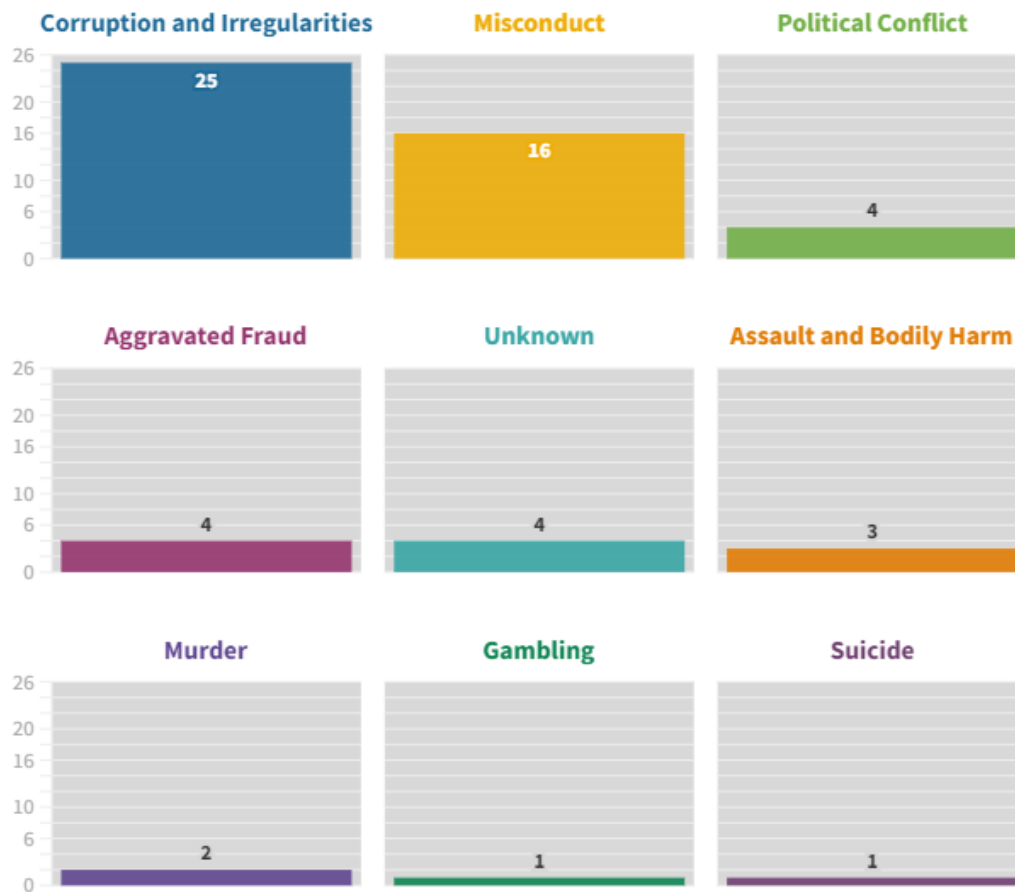
Vocational Positions of Complainants

Lawyer Unknown Businessperson Senior Bureaucrat Minister Company District Governor Mayor
Academician Doctor Civilian Defendant Provincial Police Chief S. M. of Political Party Civil Servant Judge
Artist P. Dir. of National Education

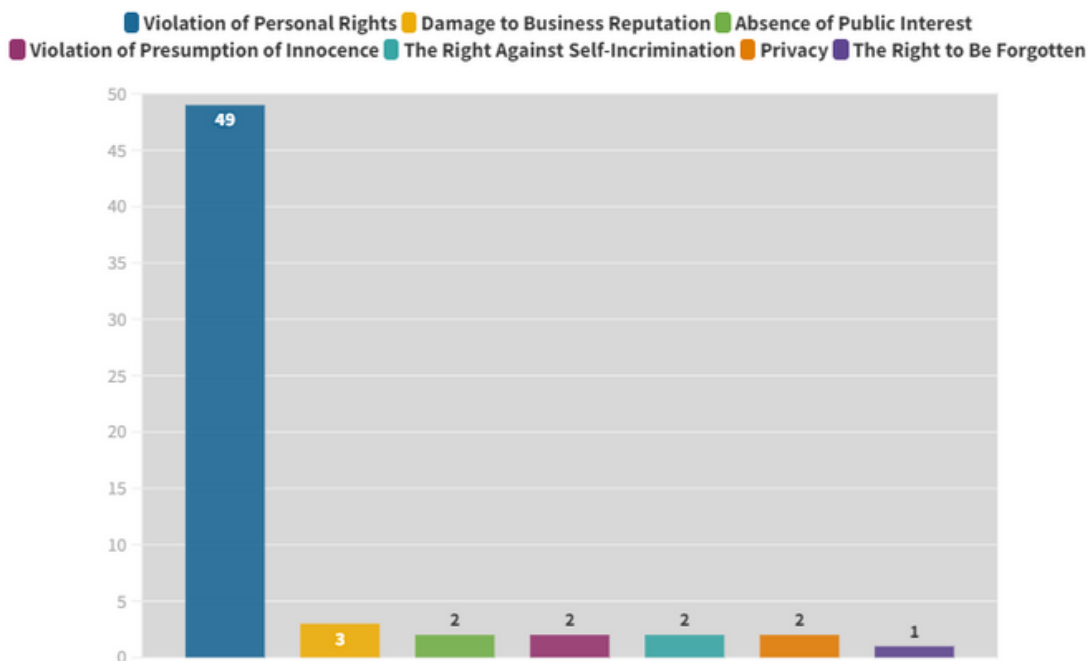


5.8 TELE1

Distribution of News Topics Requested to be Taken Down



Justifications for Content Removal Requests



TELE1 received 51 orders to take down news content from its website.

The majority of the content taken down was reports of 'corruption and irregularities' (25 articles), followed by 'misconduct' (16 items). There were also 6 news articles reporting on both themes.

49 out of 51 takedown requests were based on 'violation of personal rights'. The complainants who cited 'violation of personal rights' were predominantly **business people** (14 items).

Furthermore, the majority of the individuals who filed requests to take down news reports on TELE1 were **business people** (14 items), followed by **ministers** (8 items).

The news reports on '*corruption*' were mostly targeted by **business people** (6 items), and the majority of the news items on '*misconduct*' were taken to court by **ministers** (5 items).

Six 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).

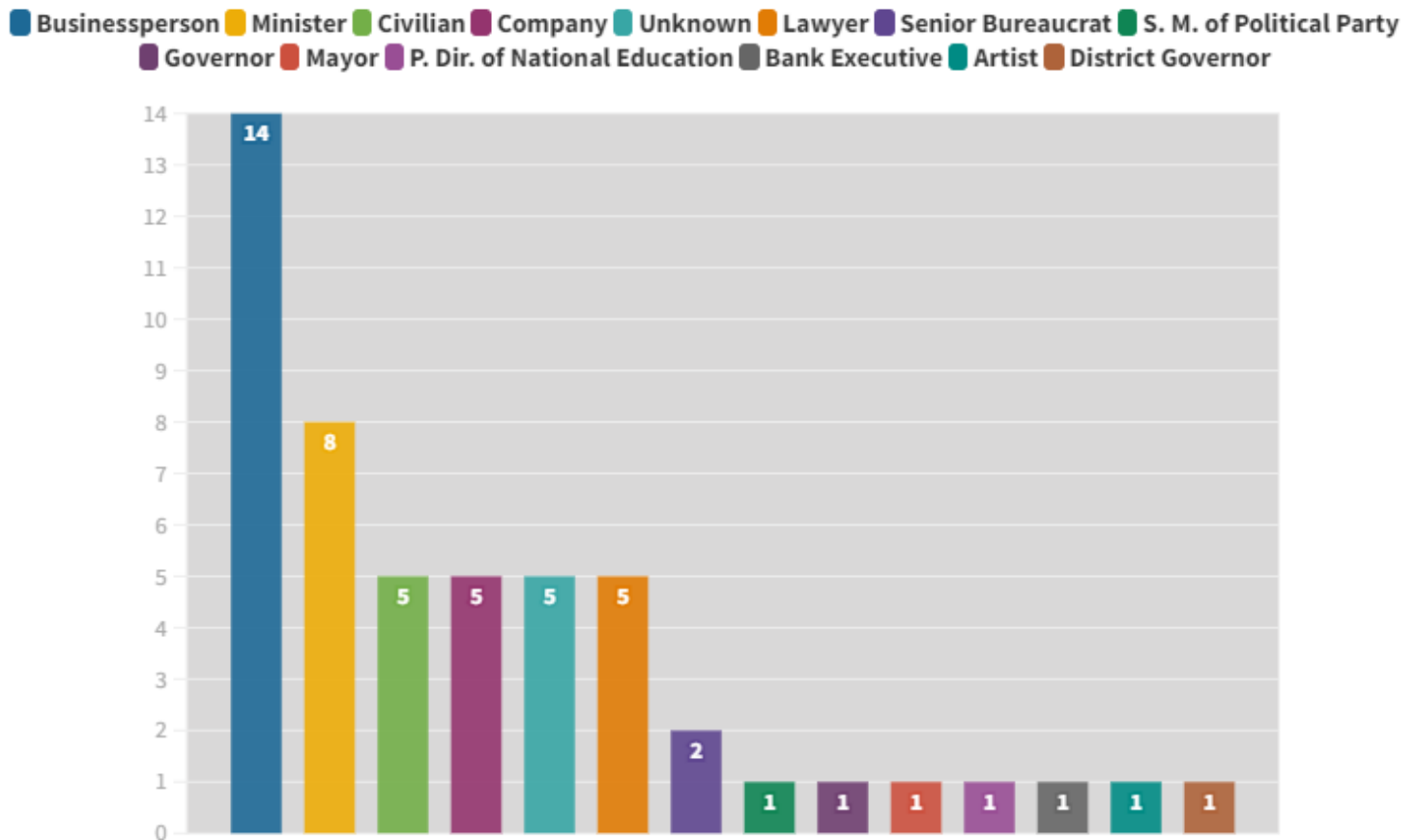
Five out of eight news articles involving **ministers** were about '*misconduct*', and the

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*'.

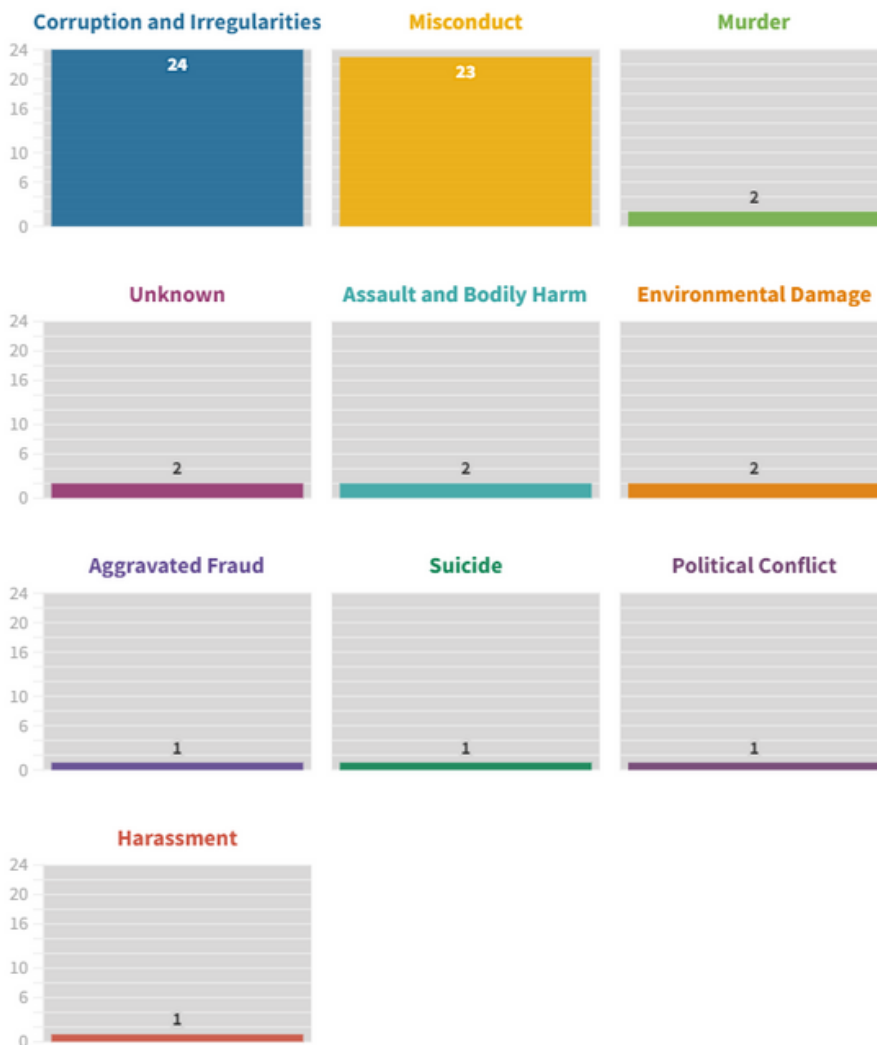
Business people filed complaints to take down news reports citing '*corruption and irregularities*' (6 items), '*misconduct*' (3 items), '*fraud*' (3 items), '*murder*' (2 items), all of which were accepted by authorities on the basis of '*violation of personal rights*'.

Vocational Positions of Complainants



5.9 Evrensel Daily

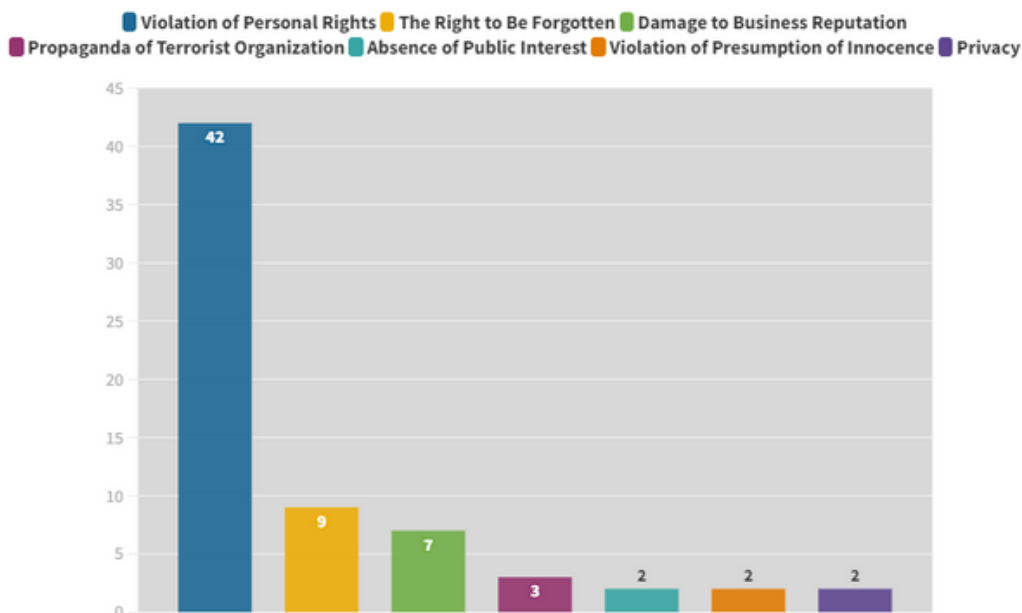
Distribution of News Topics Requested to be Taken Down



With 51 takedown orders, Evrensel Daily was in 9th place among the news outlets that received requests to remove content from their digital platforms. 24 out of these 51 news reports that were targeted were news reports on 'corruption and irregularities' and 23 were about 'misconduct'.

Furthermore, it should be noted that nine news articles cited both 'misconduct' and 'corruption and irregularities'. Three out of nine news reports, the alleged perpetrators were **senior bureaucrats**. Besides, one news article contained allegations of 'misconduct' and 'harassment'.

Justifications for Content Removal Requests



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' (42 items) and the 'right to be forgotten' (9 items).

The majority of the complainants were **companies** (8 items) and **senior bureaucrats** (8 items). Also, these group followed by **civillians** (6 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).

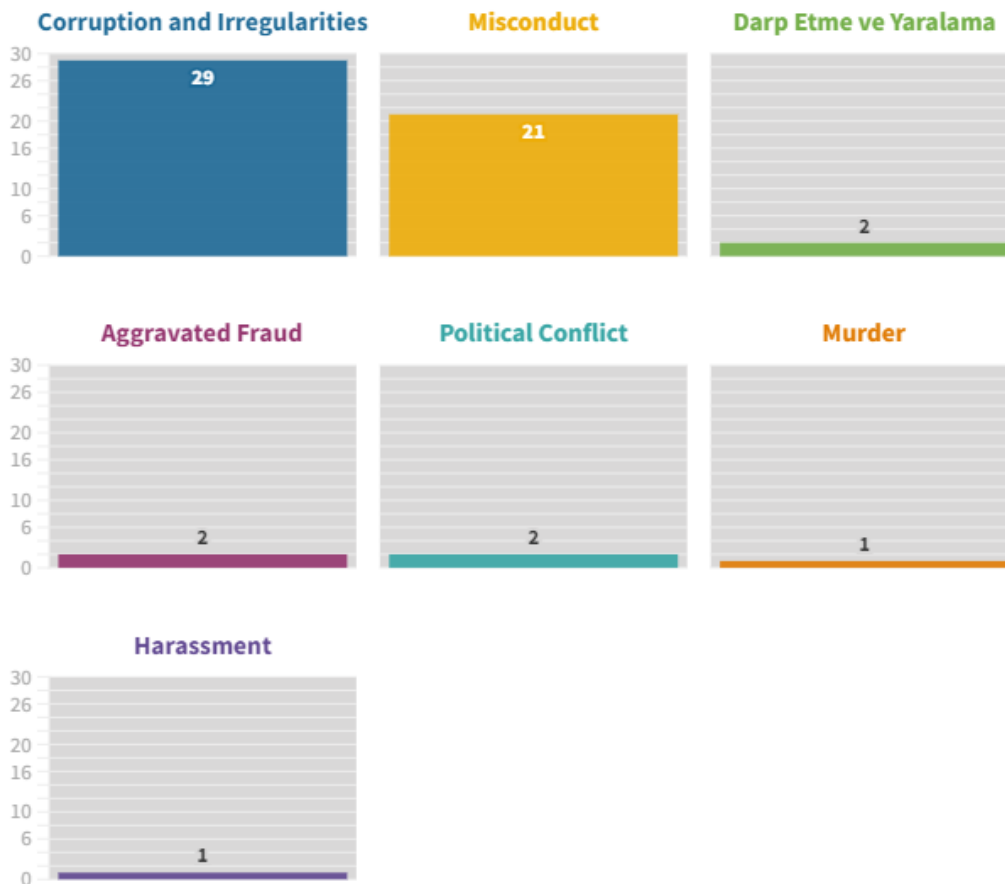
Besides, the majority of the complainants who targeted content on ‘corruption and irregularities’ were **senior bureaucrats** (8 items).

Vocational Positions of Complainants



5.10 Yeniçağ Newspaper

Distribution of News Topics Requested to be Taken Down



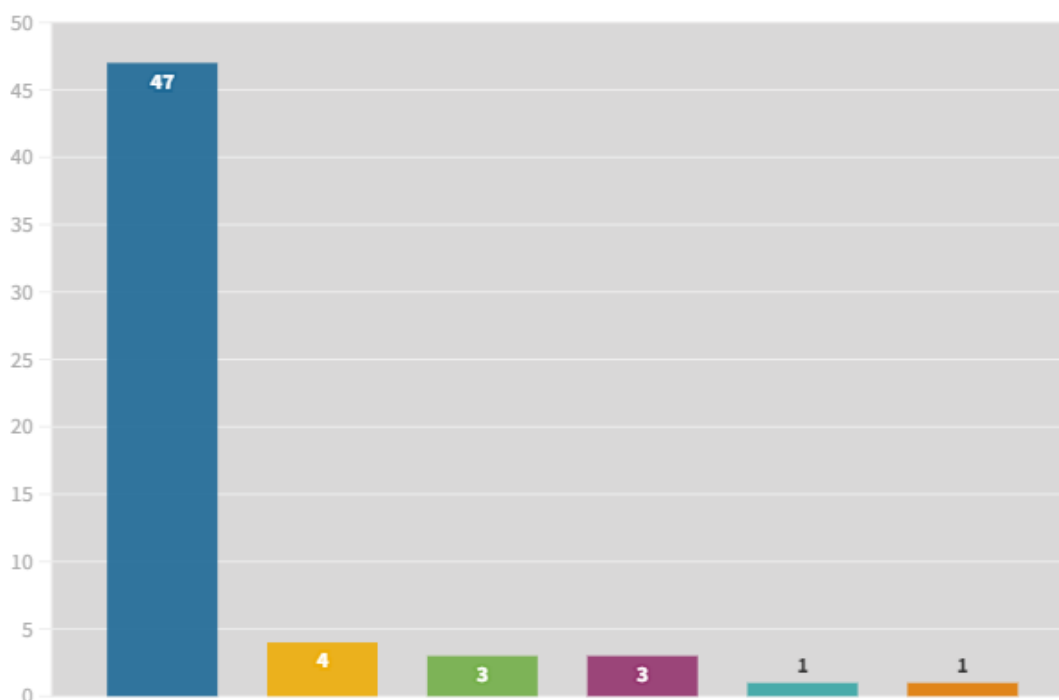
Yeniçağ Newspaper received 48 orders to remove news content from its website.

The orders included 29 news reports on 'corruption and irregularities', 21 news articles on 'misconduct'. Eight news articles reported both 'corruption and irregularities' and 'misconduct'. In three articles the alleged perpetrators were **provincial director of national education** and two articles 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' (47 items), and the complainants who cited this justification were predominantly **business people** (17 items).

Justifications for Content Removal Requests

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



In fact, the majority of the individuals who placed content removal requests against Yeniçağ were also **business people** (17 items).

It is followed by **senior members of political parties** (5 items), **lawyers** (5 items), and **ministers** (4 items).

Besides, 12 out of 17 news articles involving **business people** were about '*corruption and irregularities*', and 5 were reports of '*misconduct*'.

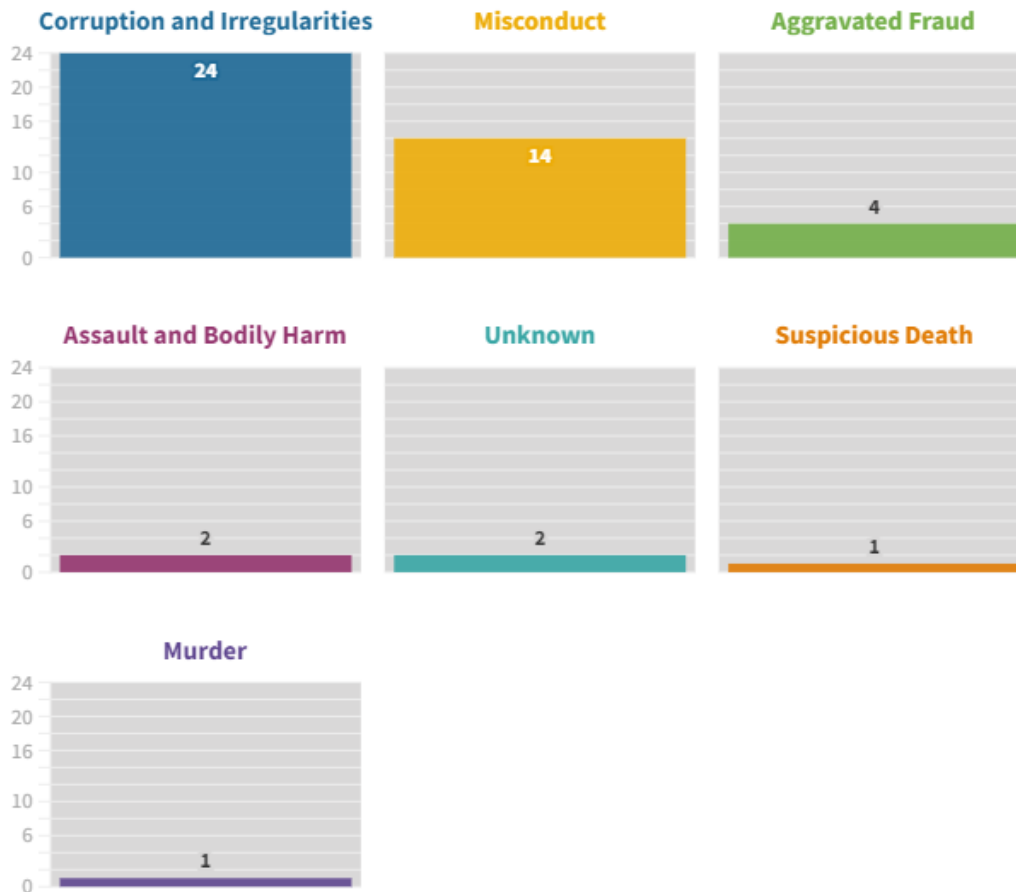
All of the takedown requests against these news reports were based on '*violation of personal rights*'.

Vocational Positions of Complainants



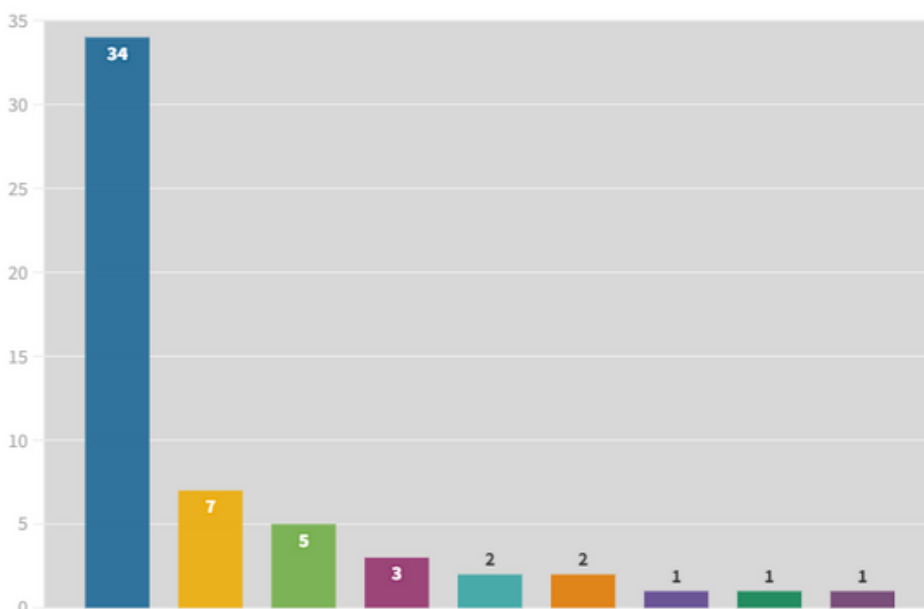
5.11 dokuz8NEWS

Distribution of News Topics Requested to be Taken Down



Justifications for Content Removal Requests

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



According to research findings, 44 content removal orders were sent to dokuz8NEWS.

24 orders were placed for news reports on 'corruption and irregularities', while 14 targeted news items on 'misconduct'. Besides, there were three news items which reported both 'corruption and irregularities' and 'misconduct'.

The most cited justification in these orders was the 'violation of personal rights' (34 items). Other justifications include: 'Damage to business reputation' (7 items), and 'privacy' (5 items).

The majority of the complainants were **business people** (10 items), followed by **companies** (7 items), **civillians** (5 items) and **senior members of political parties** (4 items).

The actors in news reports on ‘*corruption and irregularities*’ were predominantly **business people** (7 items) and **companies** (7 items).

Besides, all of the 10 requests placed by business people were based on ‘*violation of personal rights*’.

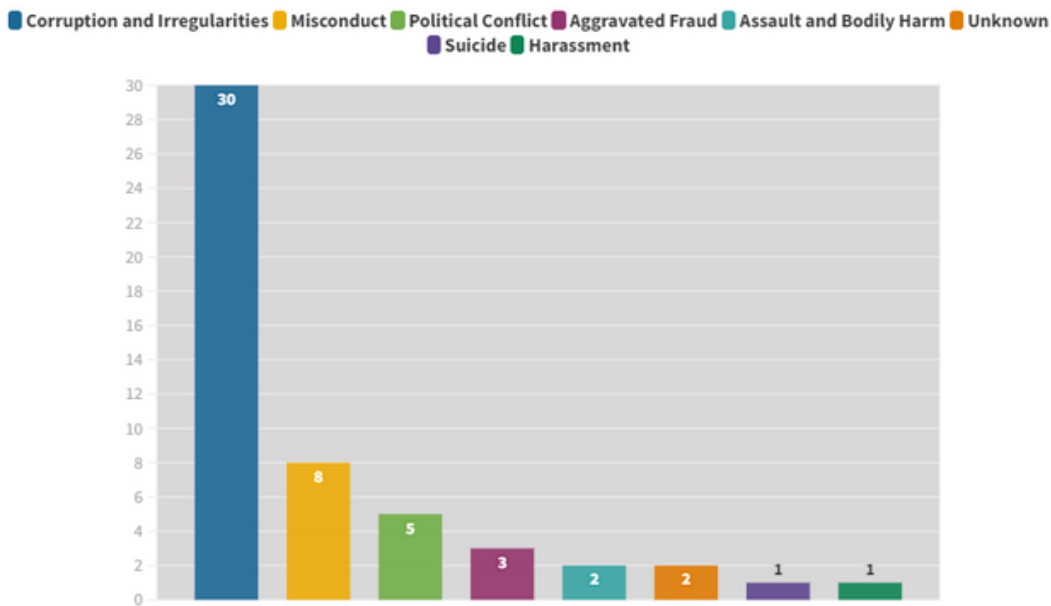
On the other side, all of the court cases filed by **companies** (7 items) targeted news reports on ‘*corruption and irregularities*’, and the content was blocked on the basis of ‘*damage to business reputation*’.

Vocational Positions of Complainants



5.12 ABC Newspaper

Distribution of News Topics Requested to be Taken Down



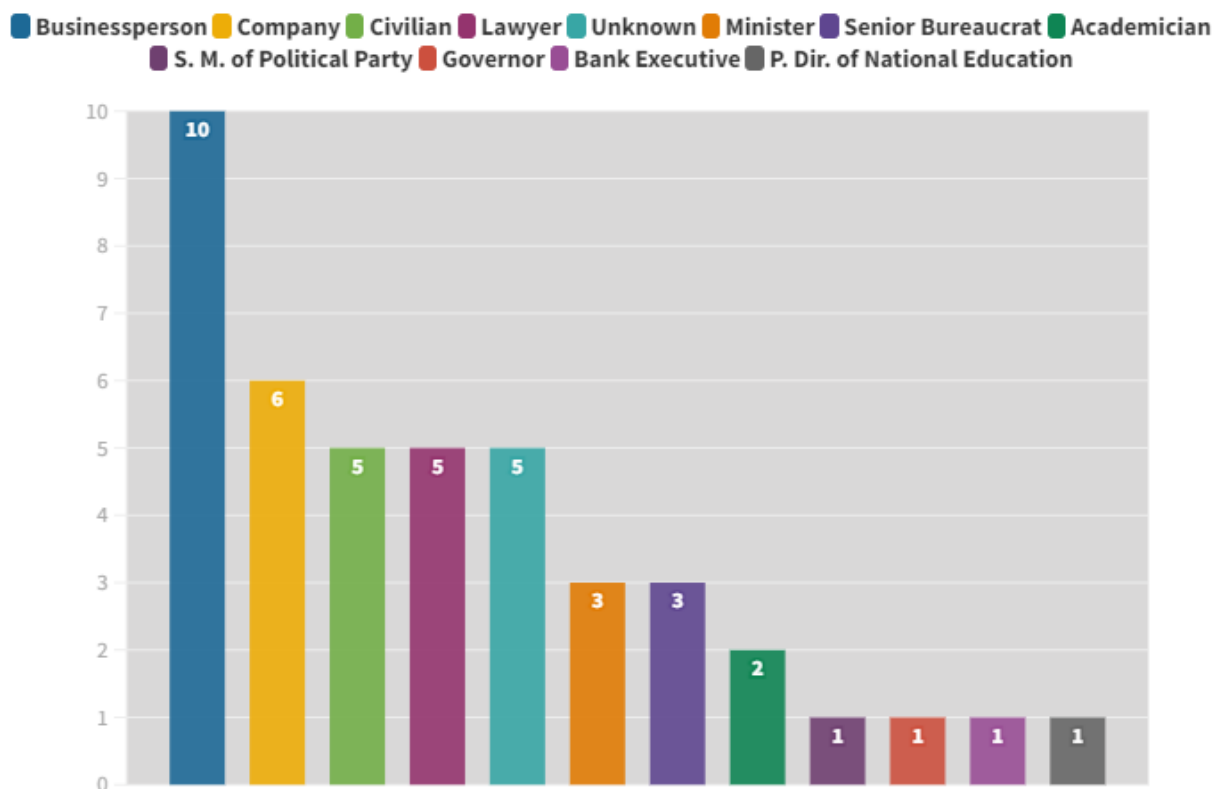
43 content removal orders were placed against ABC Newspaper, an online news platform. Out of 43 articles 30 were reports of 'corruption and irregularities' and 8 were about 'misconduct.'

Besides, four news reports cited allegations of both 'corruption and irregularities' and 'misconduct'.

39 out of 43 takedown requests were based on 'violation of personal rights'. The complainants include: **business people** (10 items), **companies** (6 items), **civilians** and **lawyers** (5 items),

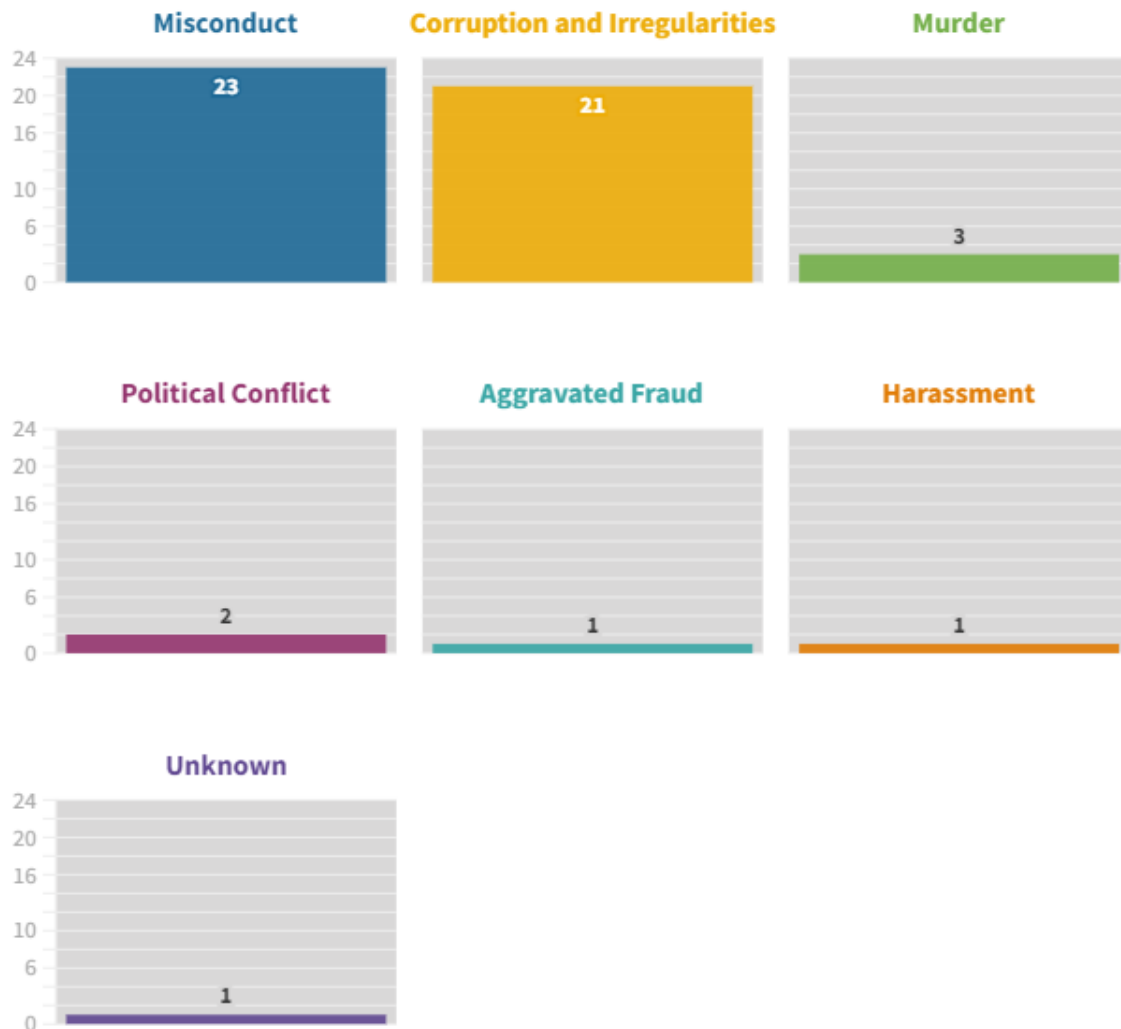
The majority of the takedown requests against news reports on 'corruption and irregularities' (9 items) came from **business people** (10 items). Besides, all of the applications filed by **business people** were approved on grounds of 'violation of personal rights'.

Vocational Positions of Complainants



5.13 İleri News

Distribution of News Topics Requested to be Taken Down



41 content removal requests were submitted against İleri News, an online news platform, including 23 news reports about '*misconduct*' and 21 articles on '*corruption and irregularities*'.

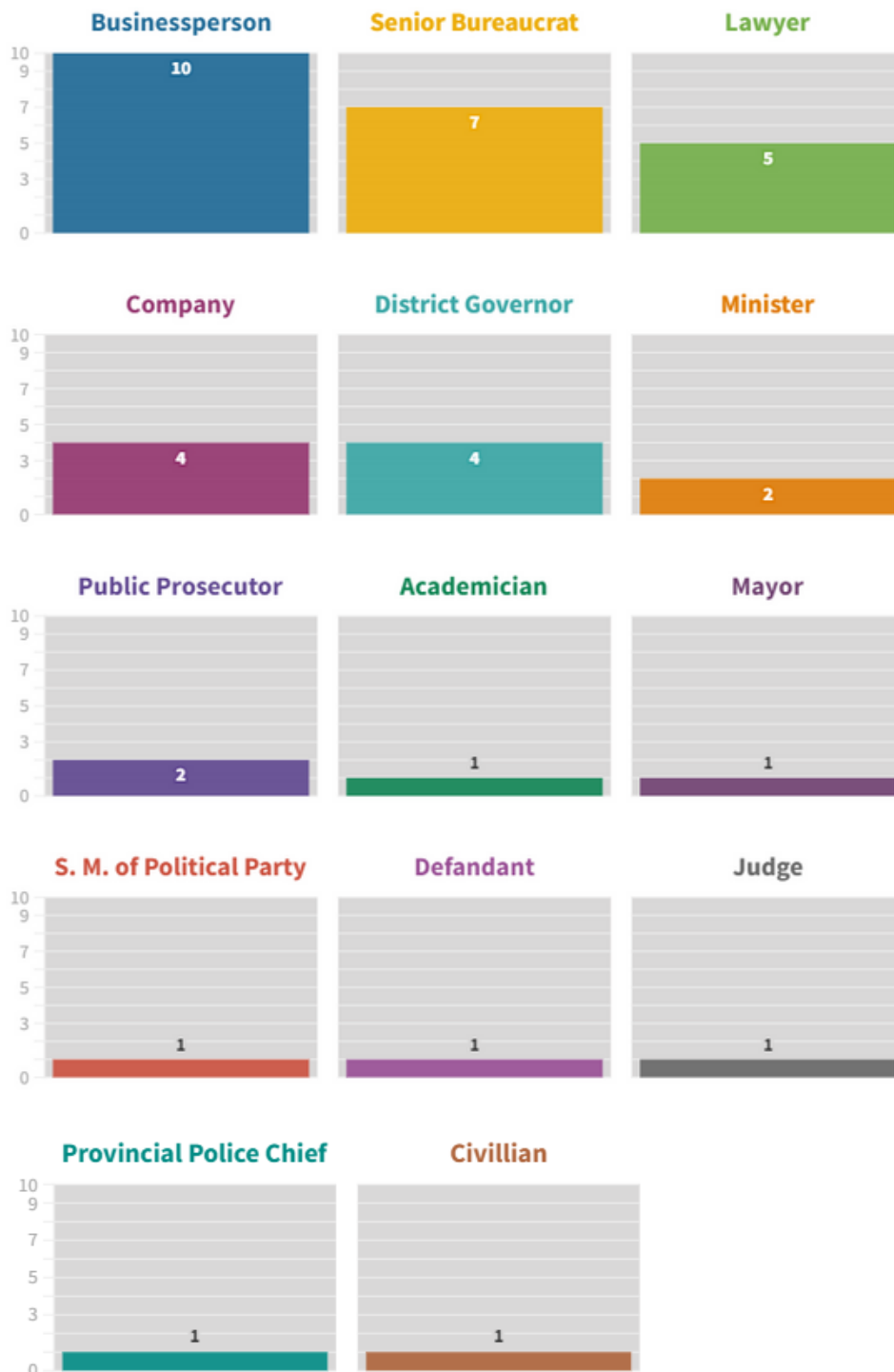
Besides, seven articles reported both '*misconduct*' and '*corruption and irregularities*'. In this cluster, the majority of the complainants were **senior bureaucrats** (4 items).

40 out of 41 news removal requests were based on '*violation of personal rights*'. In general, the majority of the takedown requests against İleri News were placed by **business people** (10 items) and **senior bureaucrats** (7 items).

The complainants who placed takedown requests against news reports on 'misconduct' were also **business people** (5 items) and **senior bureaucrats** (4 items)

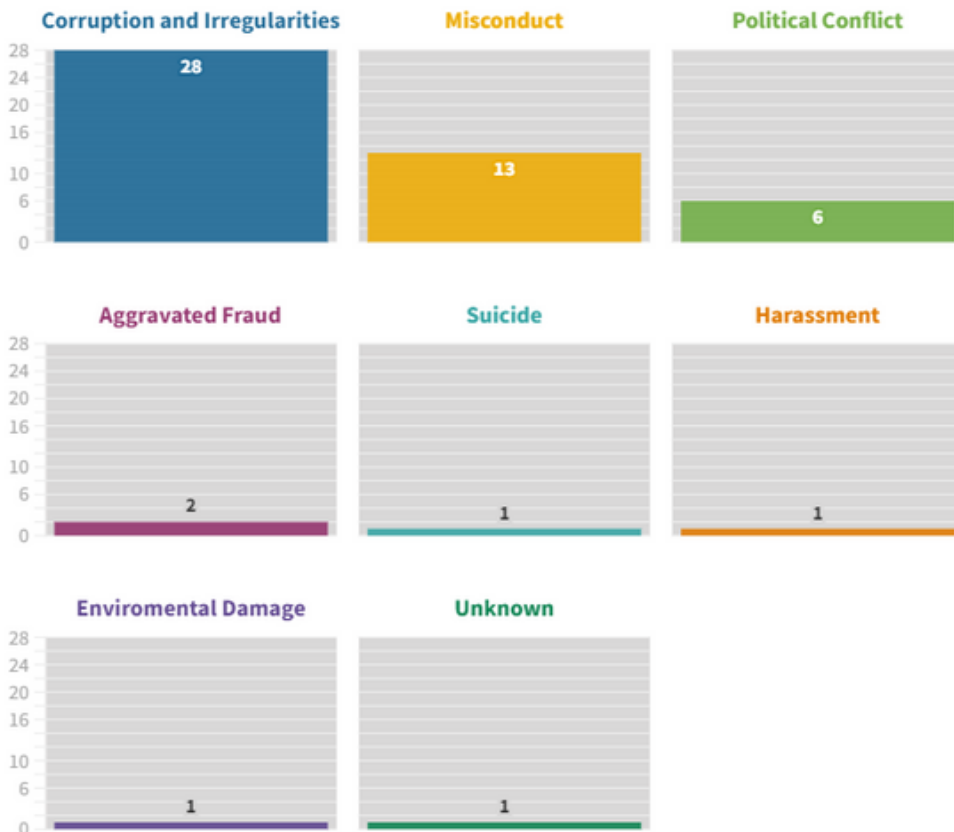
In addition to that more than half of the content removal requests against news articles about 'corruption and irregularities' were placed by **business people** (10 items) and **senior bureaucrats** (7 items).

Vocational Positions of Complainants



5.14 Halk TV

Distribution of News Topics Requested to be Taken Down



Vocational Positions of Complainants



40 content removal orders were placed against Halk TV, the online website of the television channel.

The list included 28 orders targeting news reports on 'corruption and irregularities', and 13 orders to take down content on 'misconduct'.

Furthermore, eight news reports covered allegations of both 'corruption and irregularities' and 'misconduct.' The removal requests against these eight news articles were placed by **business people** (3 items), **senior bureaucrats** (2 items), **ministers** (1 item).

38 out of 40 takedown requests cited 'violation of personal rights'. The complainants include: **business people** (12 items), **companies** (8 items), **ministers** (4 items) and **senior bureaucrats** (2 items).

Particularly the majority of the requests to remove content on 'corruption and irregularities' came from **business people** (11 items), **companies** (8 items) and **senior bureaucrats** (2 items).

Furthermore, the news reports on 'misconduct' were targeted by **business people** (3 items), **academics** (2 items), **ministers** (2 items), and **senior bureaucrats** (2 items).

5.15 Gazette Manifesto

In our review, we identified 31 content removal requests placed against the news content published by Gazette Manifesto, an online news outlet. 17 out of these 31 requests were placed against news reports on *'corruption and irregularities'* and the remaining 10 requests targeted articles containing allegations of *'misconduct'*. Both offenses were mentioned in three news report.

All of the takedown orders against Gazette Manifesto were based on *'violation of personal rights'*.

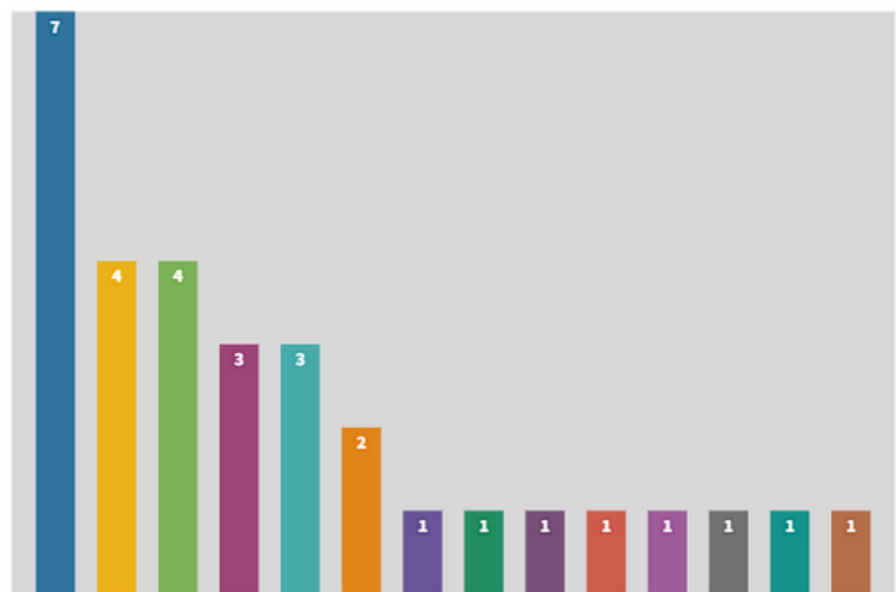
The majority of the alleged perpetrators in news articles on *'corruption and irregularities'* were **business people** (6 items).

Furthermore, the significant majority of all content removal requests against the news outlet were placed by **business people** (7 items).

However, the majority of the takedown requests against news articles on *'misconduct'* came from **ministers** (2 items) and **district governors** (2 items).

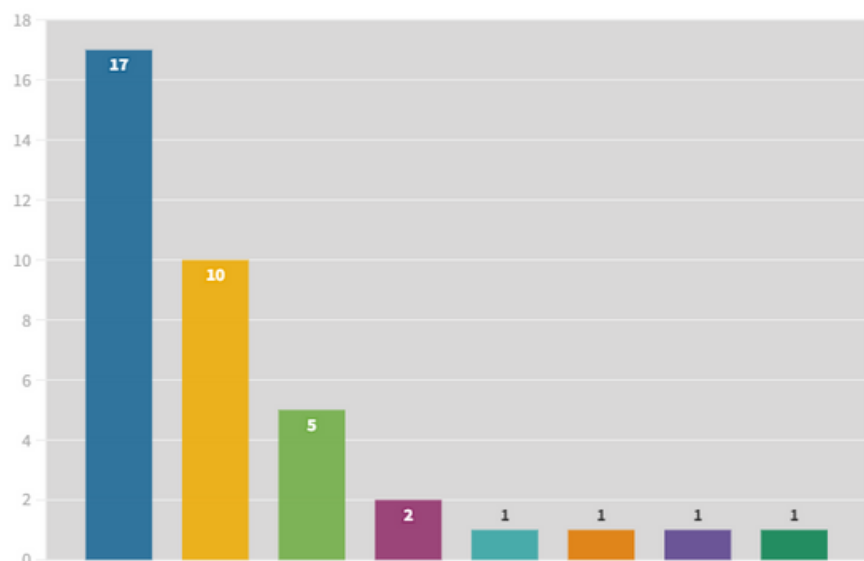
Vocational Positions of Complainants

Businessperson Lawyer Company Civilian Minister District Governor Senior Bureaucrat Bank Executive
S. M. of Political Party Member of the Parliament Senior Military Official Artist P. Dir. of National Education
Unknown



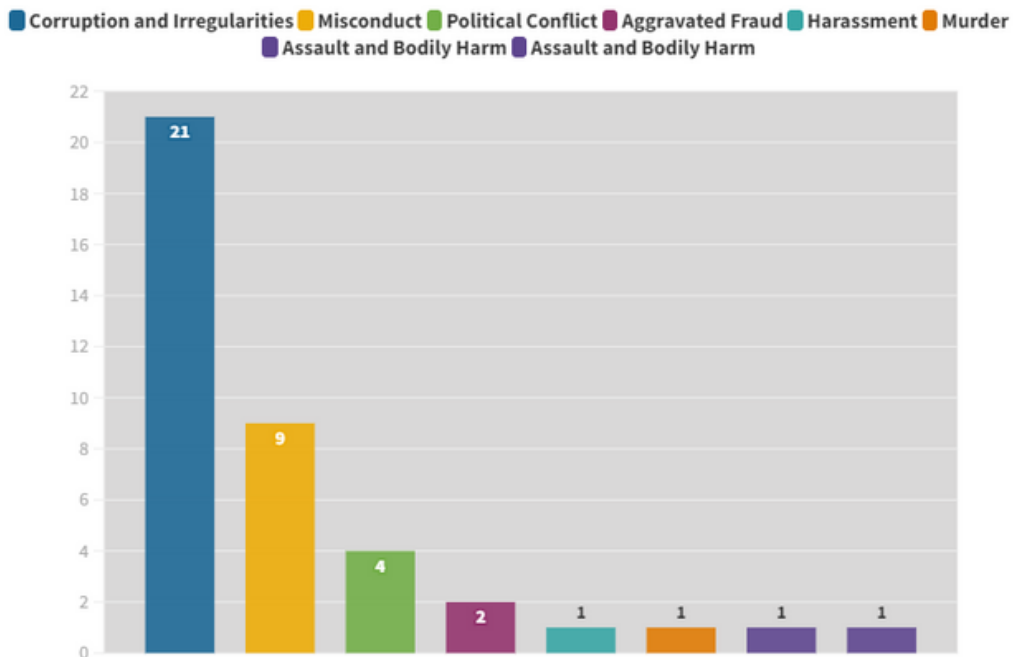
Distribution of News Topics Requested to be Taken Down

Corruption and Irregularities Misconduct Political Conflict Aggravated Fraud Suicide Gambling Murder
Unknown



5.16 Artı Gerçek

Distribution of News Topics Requested to be Taken Down

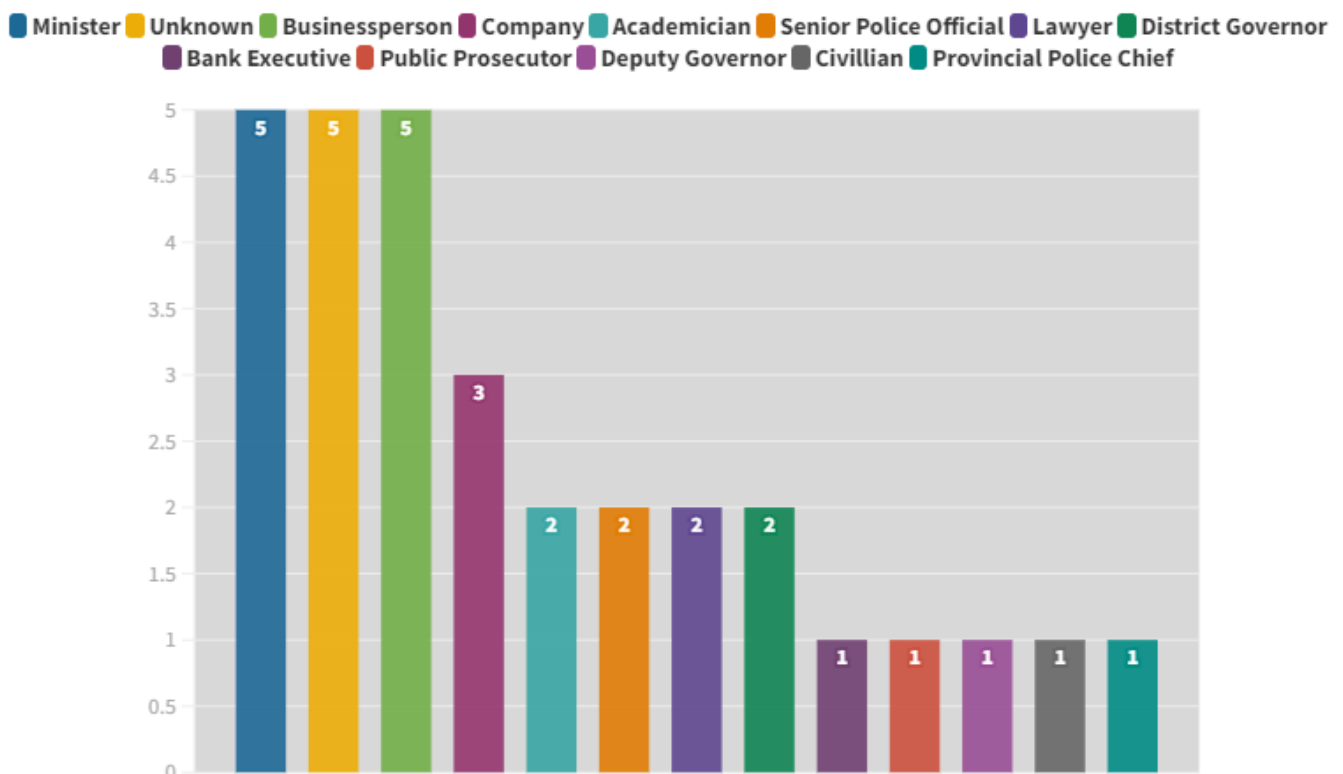


Authorities placed 31 takedown orders against Artı Gerçek, an online news outlet, including 21 news reports on ‘*corruption and irregularities*’ and 9 articles on ‘*misconduct*’.

Furthermore, four news article about a **minister** featured allegations of ‘*corruption and irregularities*’ as well as ‘*misconduct*’. At the top of this list were **senior police officials** (2 items)

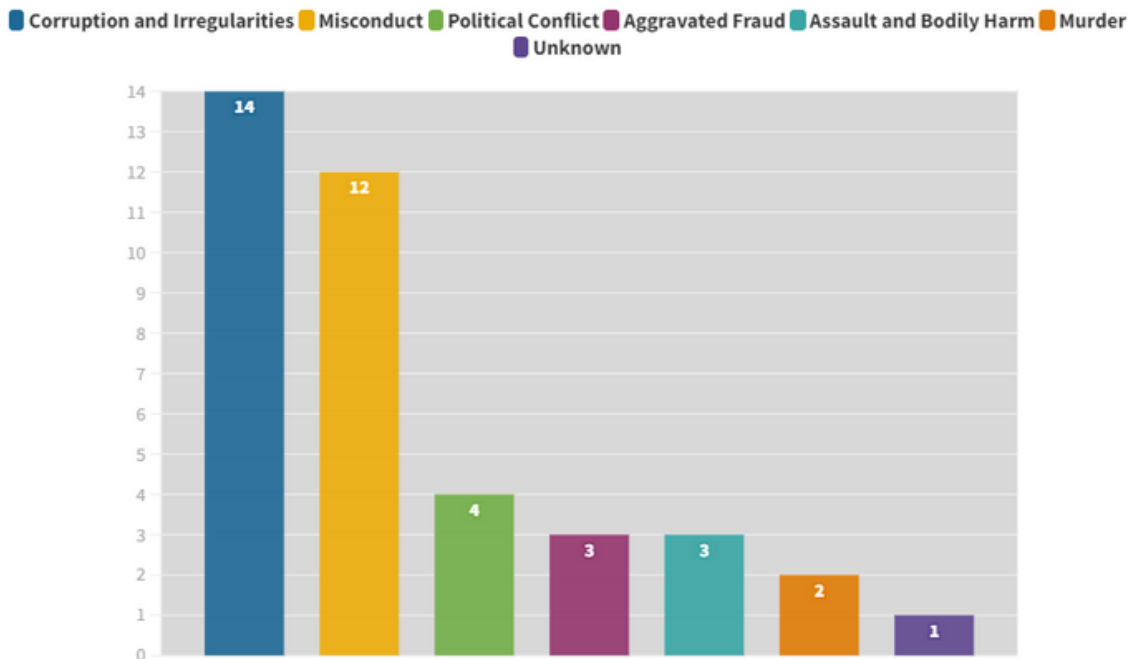
Majority of the takedown orders were based on ‘*violation of personal rights*’ (30 items). The majority of the complainants were **ministers** (5 items), and **business people** (5 items).

Vocational Positions of Complainants



5.17 Gazette Duvar

Distribution of News Topics Requested to be Taken Down

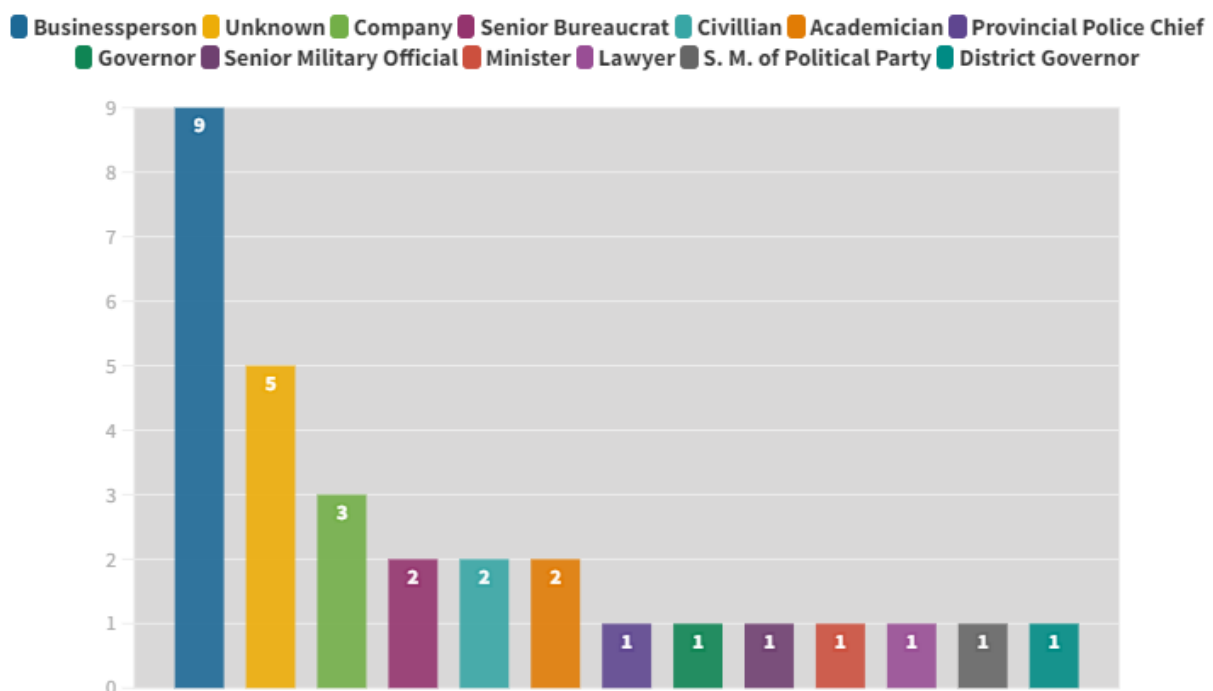


Gazette Duvar, an online newspaper, received 30 content removal orders. 14 takedown orders were placed to remove news on 'corruption and irregularities' and the 12 takedown orders targeted articles about 'misconduct'.

In addition, the list included four news content which reported 'corruption and irregularities' as well as 'misconduct'. At the top of this list were **senior bureaucrats** (2 items).

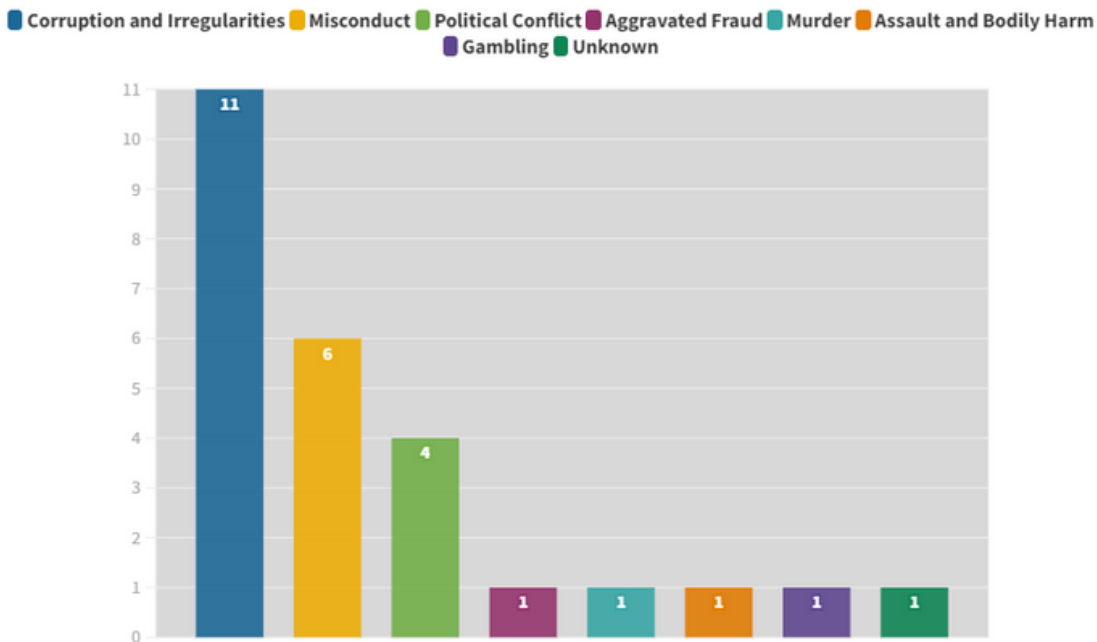
There were 26 content removal requests based on 'violation of personal rights'. In addition to that 'right to be forgotten' (3 items) and 'damage to business reputation' (3 items) were cited in requests. The majority of the takedown requests were placed by **business people** (9 items), **companies** (3 items), **senior bureaucrats** (2 items), **civilians** (2 items) and **academics** (2 items).

Vocational Positions of Complainants



5.18 Yurt Newspaper

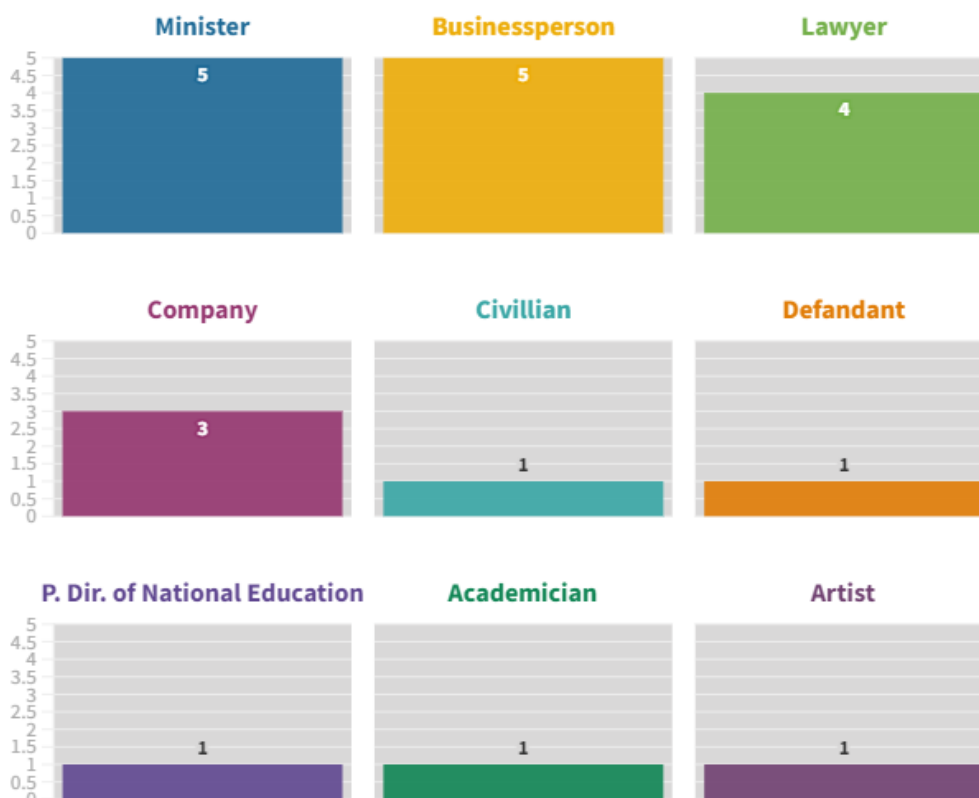
Distribution of News Topics Requested to be Taken Down



22 takedown orders were placed against the online news portal of Yurt Newspaper. 11 of these news reports were about 'corruption and irregularities' and 6 were reports of 'misconduct'. Both offenses were mentioned in two news report.

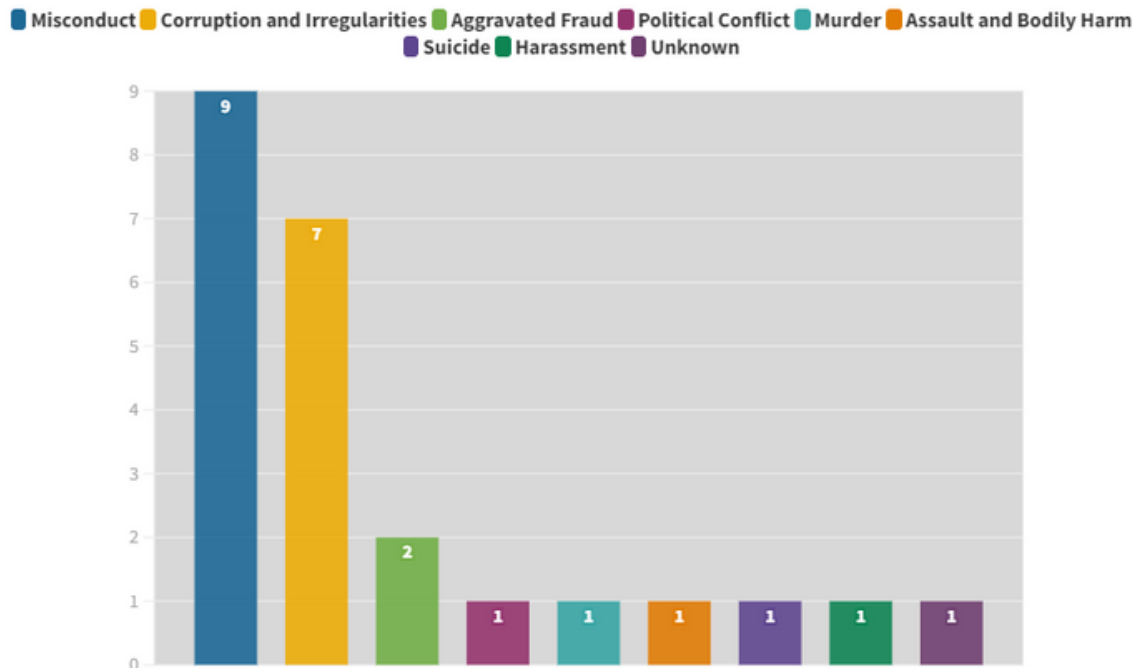
All of the 22 content removal requests were based on 'violation of personal rights'. In fact, the majority of the individuals who filed complaint against Yurt were **business people** (5 items), **ministers** (5 items), and **lawyers** (4 items).

Vocational Positions of Complainants



5.19 Sputnik Turkey

Distribution of News Topics Requested to be Taken Down

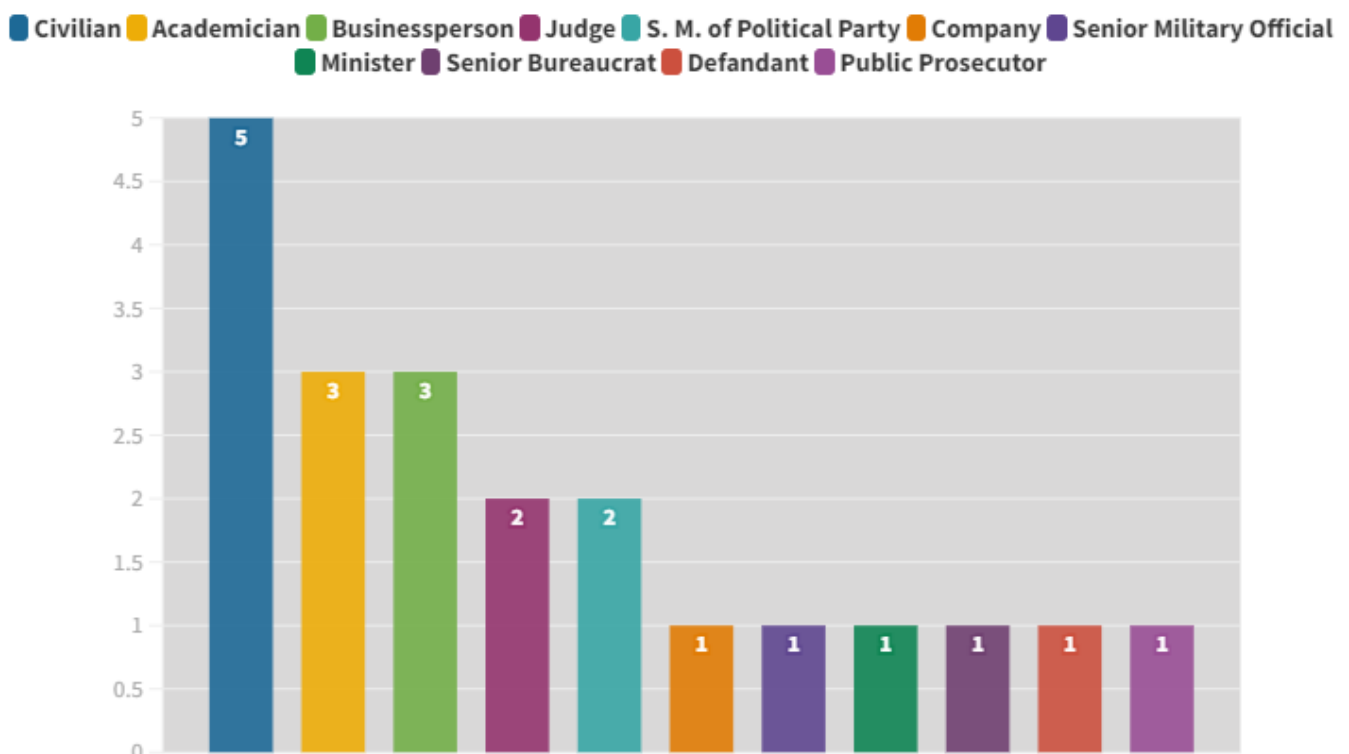


Sputnik Turkey, received 21 content removal requests.

9 requests were placed against news reports citing 'misconduct' and 7 complaints were filed to remove content on 'corruption and irregularities'. Two news reports reported on both offenses.

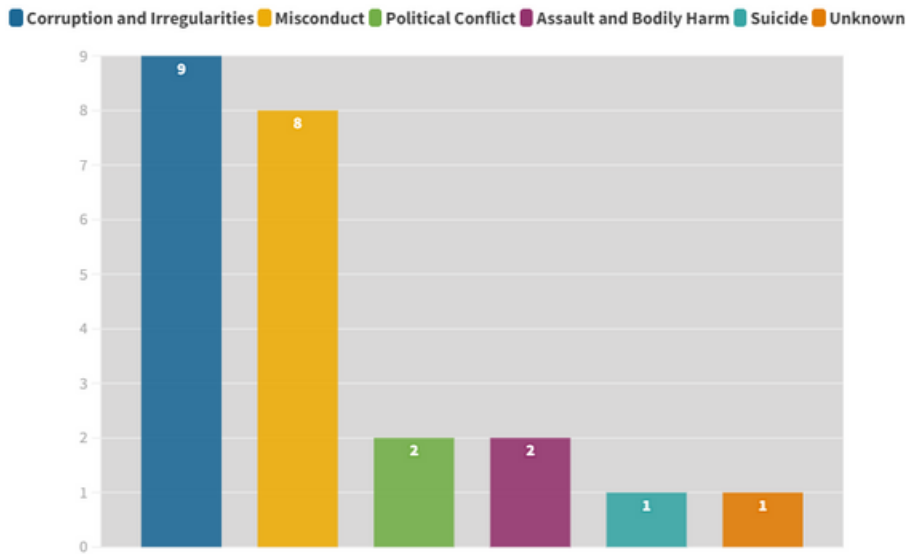
20 out of 21 takedown orders were based on '*violation of personal rights*'. The majority of the complainants were **civilians** (5 items) **academicians** (3 items), **business people** (3 items) **senior members of political parties** (2 items), **judges** (2 items).

Vocational Positions of Complainants



5.20 Karar Newspaper

Distribution of News Topics Requested to be Taken Down



There were 18 takedown orders issued against the news reports published on the website of Karar, a daily newspaper.

9 of these news reports were about 'corruption and irregularities' and 8 articles reported allegations of 'misconduct'.

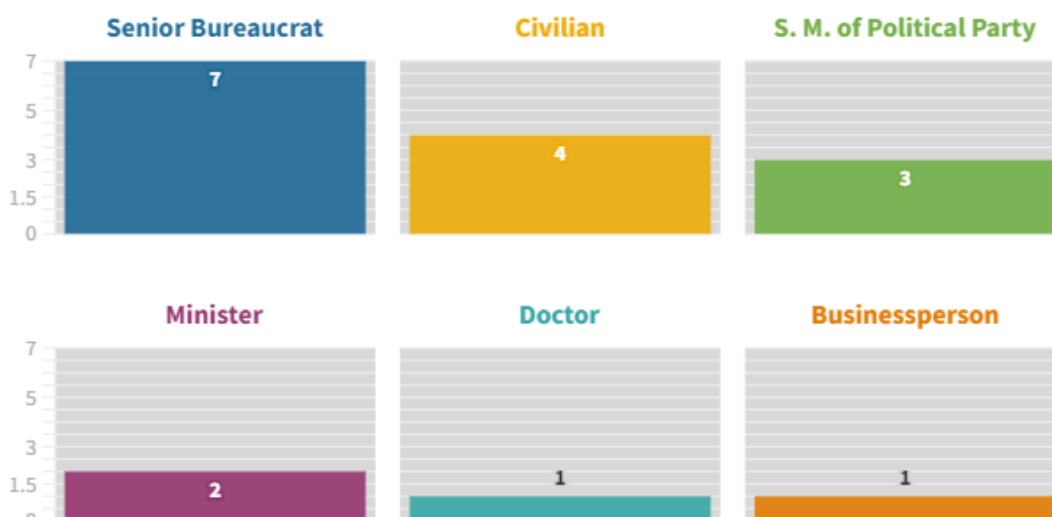
The majority of the content removal requests placed against Karar were based on 'violation of personal rights' (13 items), 'right to be forgotten' (5 items) and 'violation of presumption of innocence' (4 items).

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** (7 items). Furthermore, the majority of the alleged perpetrators in news reports on 'corruption and irregularities' (7 items) and 'misconduct' (4 items) were also **senior bureaucrats**. Other complainants include **civilians** (4 items) and **senior members of political parties** (3 items).

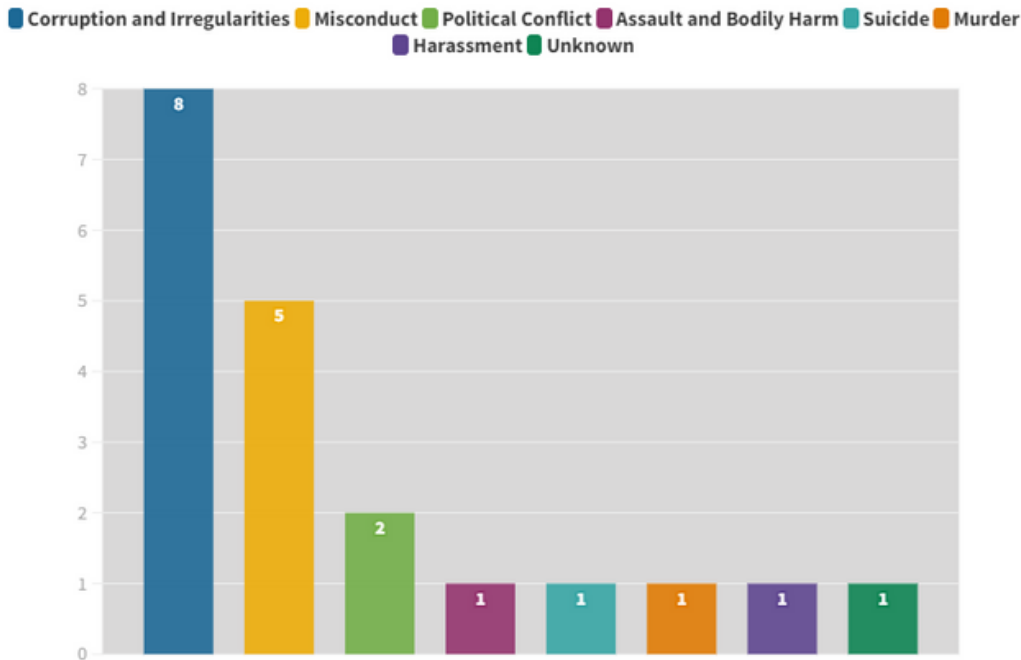
There were five news items in total which reported on both 'corruption and irregularities' and 'misconduct.' In this cluster, the majority of the complainants were **senior bureaucrats** (4 items).

Vocational Positions of Complainants



5.21 Gazette Yolculuk

Distribution of News Topics Requested to be Taken Down

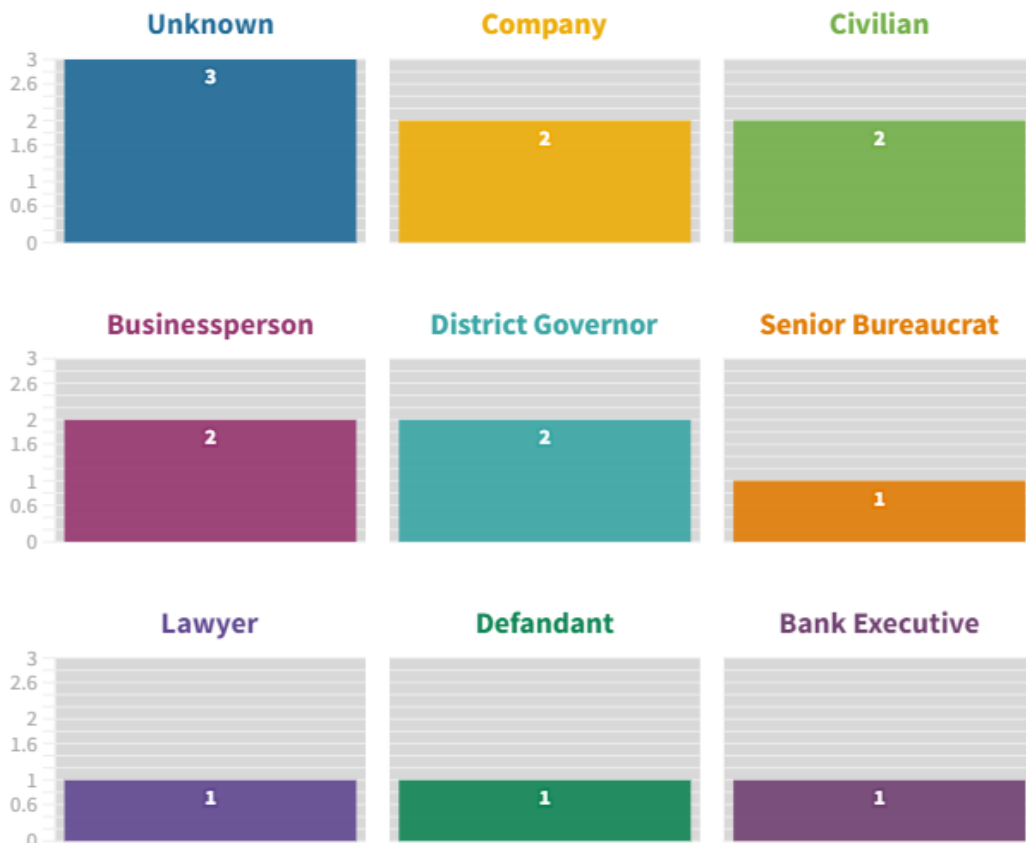


Gazette Yolculuk, an online news platform, received 15 content removal requests.

These requests mainly targeted news content on actions involving 'corruption and irregularities' (8 items) and 'misconduct' (5 items).

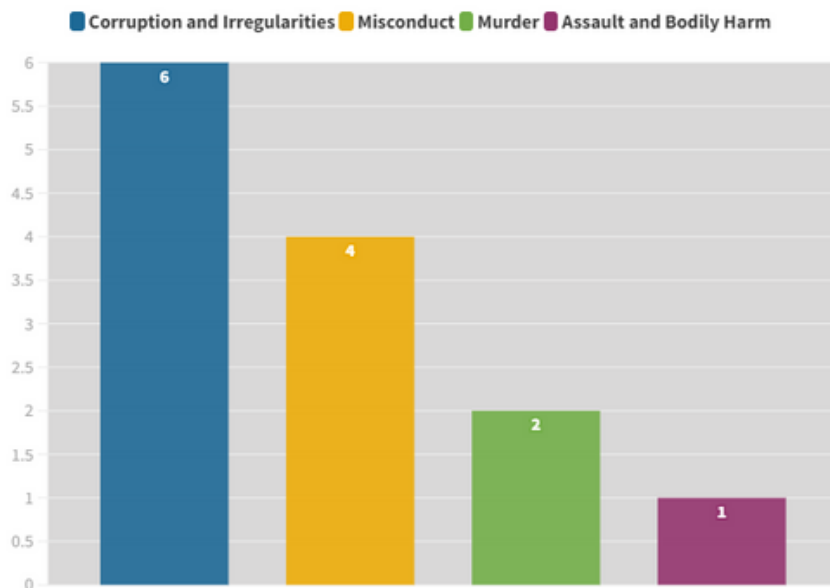
Corruption-irregularities and '*political conflict*' were intertwined in two reports and also in one report, '*corruption-irregularities*' and '*misconduct*' were intersected. Thirteen of the 15 contents were justified as '*violations of personal rights*'.

Vocational Positions of Complainants



5.22 BIANET

Distribution of News Topics Requested to be Taken Down

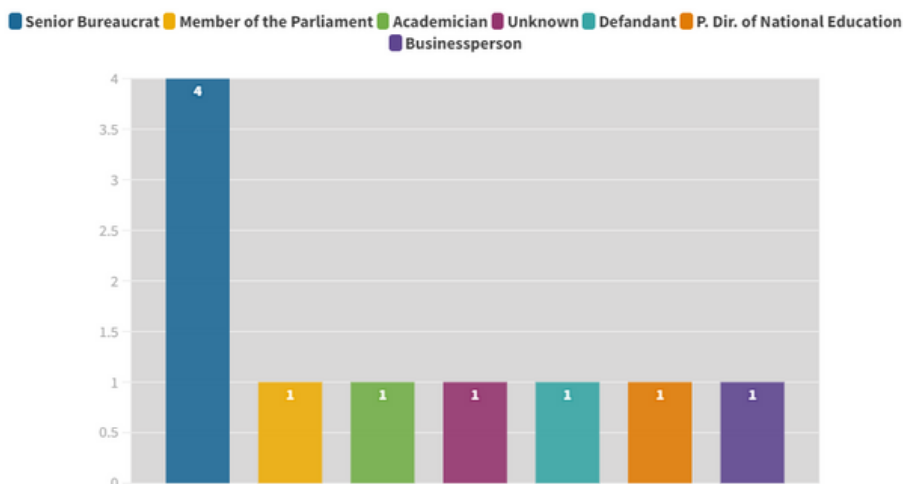


There were ten takedown orders placed against BIANET.

The list included two news articles reporting on both '*corruption and irregularities*' and '*misconduct*', in which the alleged perpetrators were **senior bureaucrats**.

It should also be noted that the majority of the complainants targeting Bianet were also **senior bureaucrats** (4 items). The majority of these content removal orders were based on '*violation of personal rights*' (2 items).

Vocational Positions of Complainants

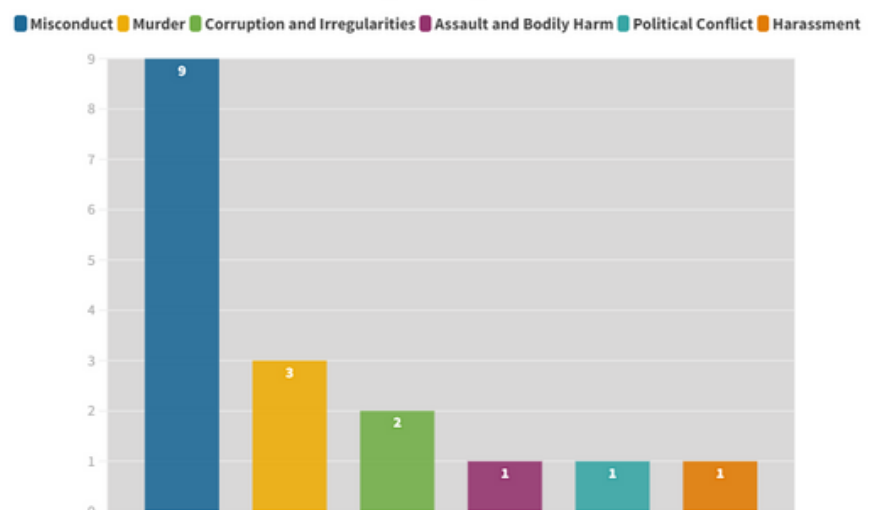


5.23 Sendika.org

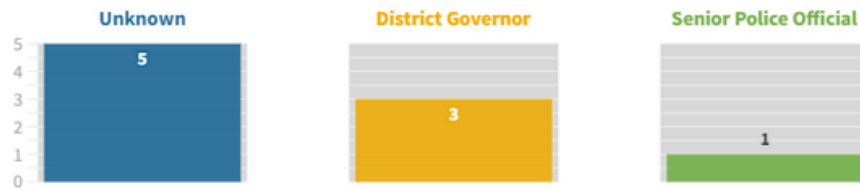
There were nine takedown orders placed against Sendika.org, an online news platform.

All of these news articles were reports of '*misconduct*' and the takedown requests targeting this content were based on '*violation of personal rights*'. In the two reports, the issue of '*misconduct*' was seen together with '*corruption and irregularities*' and in 3 reports it was intersected with *murder*. In this cluster **district governors** (3 content) were at the top of list.

Distribution of News Topics Requested to be Taken Down

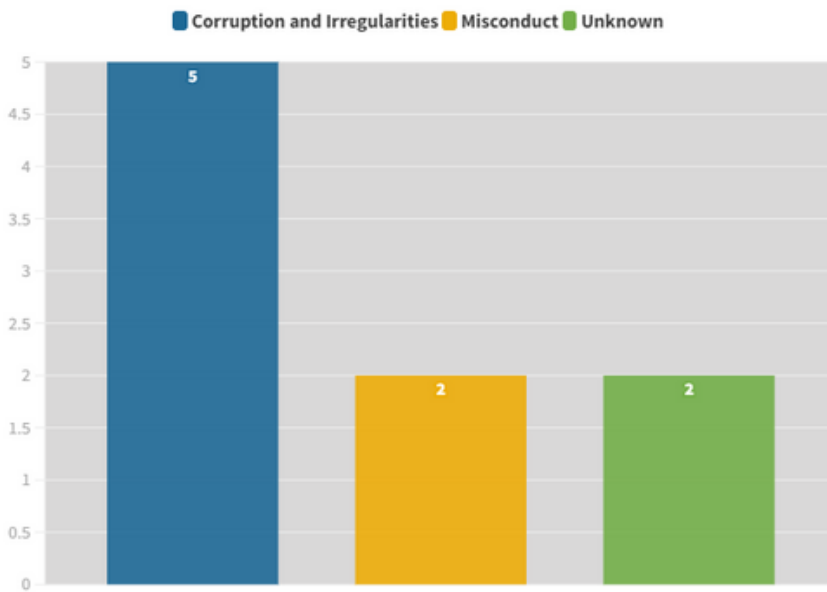


Vocational Positions of Complainants



5.24 Tükenmez News

Distribution of News Topics Requested to be Taken Down



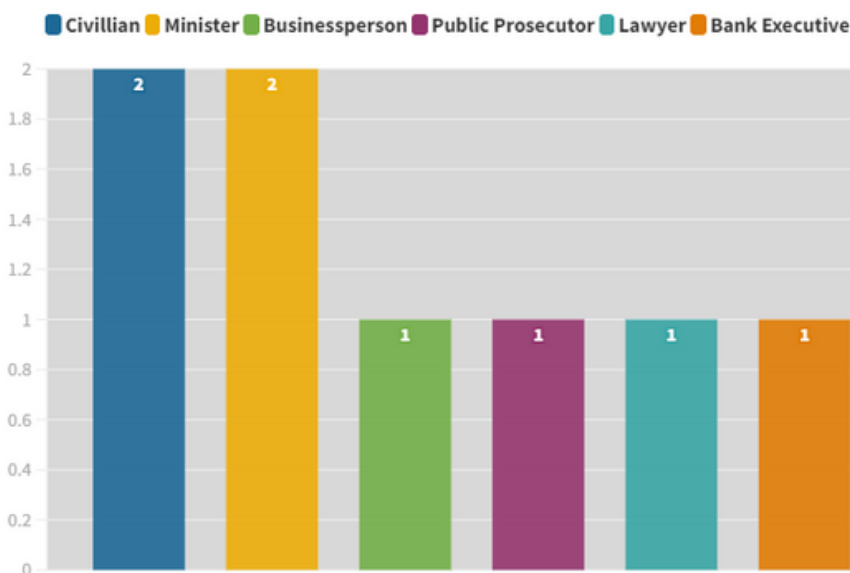
8 content removal requests were submitted against Tükenmez News, an online news outlet.

The majority of these requests were placed to remove content on 'corruption and irregularities' (5 items).

The list also included two news items on 'misconduct' as well as one news article which reported on both 'corruption and irregularities' and 'misconduct'.

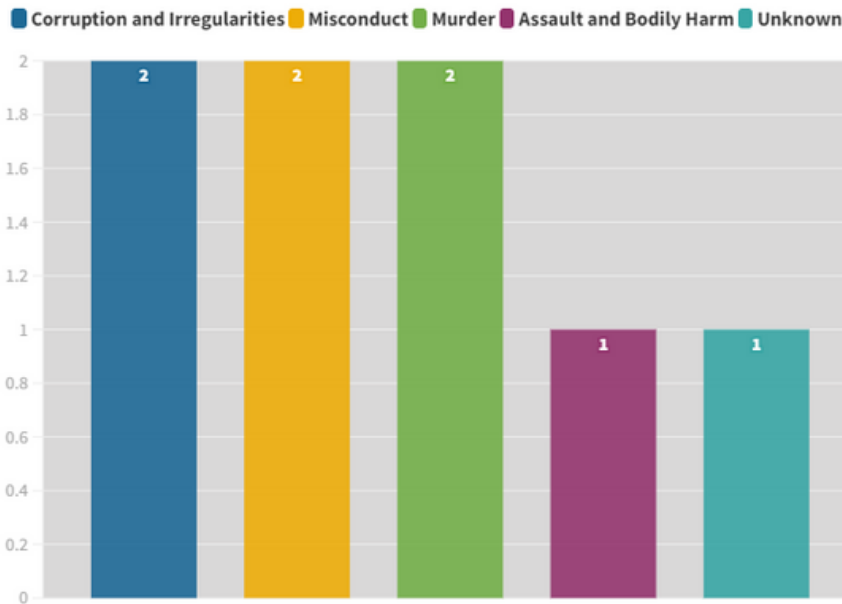
All of the takedown orders sent to Tükenmez News were based on 'violation of personal rights'. The majority of the complainants were **civilians** (2 items) and **ministers** (2 items).

Vocational Positions of Complainants



5.26 Gazette Kolektif

Distribution of News Topics Requested to be Taken Down



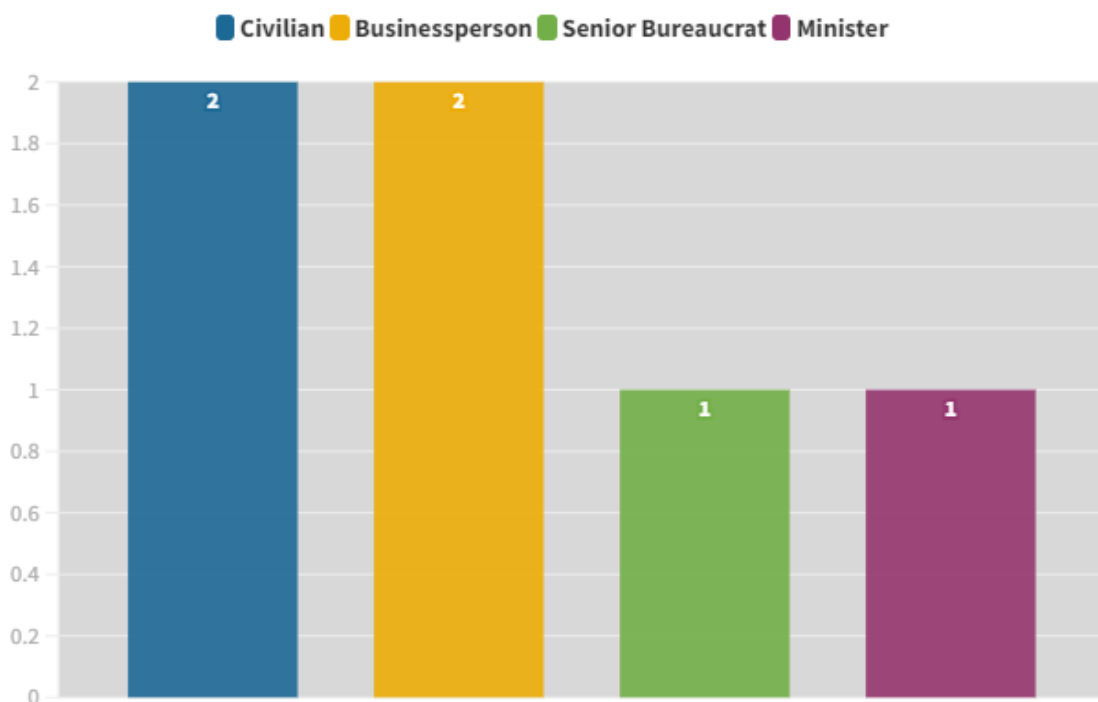
Six content removal requests were placed against Gazette Kolektif, an online news platform.

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**.

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 Gazette Kolektif came from **business people** (2 items).

Vocational Positions of Complainants



5.26 Yeni Yaşam

Authorities placed 6 content removal requests against Yeni Yaşam, an online news platform. The news distribution is as follows: *Misconduct* (6 items), *'corruption-irregularities'* (2 items), *'murder'* (2 items), *'assault and bodily harm'* (1 item). Reports of *'misconduct'* intersected with *'corruption-irregularities'* in 2 contents, *'murder'* in 2 contents and *'assault and bodily harm'* in 1 content. **District governors** (3 contents) were the group that demands the largest number of removal decisions. All decisions were based on a *'violation of personal rights'* legally.

5.27 Susma Platform

It was determined that 6 removal orders have come to the Susma Platform. 4 of these orders were on *'corruption and irregularities'* and 3 on *misconduct*. The two topics mentioned in the two news stories were intertwined. **Business people** (3 contents) were the plaintiffs of removal orders. It was followed by two people with the title of **prosecutor**. All decisions were made on the grounds of *'violence of personal rights'*.

5.28 Gazette Fersude

Four content removal orders were placed against Gazete Fersude, an online news platform. These requests came from a **minister** (1 item), **governor** (1 item), **civilian** (1 item) and a **senior bureaucrat** (1 item), and two of news articles described allegations of both *'misconduct'* and *'corruption and irregularities'*. The takedown requests were based on *'violation of personal rights'* (3 item) and *'violation of presumption of innocence'* (1 item).

5.29 DW Turkish

There were three takedown orders placed against Deutsche Welle Turkish. Two of the contents were *'corruption and irregularities'*; one was on *'misconduct'* and the legal basis for all decisions was *'violation of personal rights'*. One of the complainants was a **minister** and another one was **lawyer**; however, the position of the other complainant was unknown.

5.30 Umut Newspaper

Two content removal orders were placed against Umut Newspaper, 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 were **ministers** (1) and **bank executives** (1 item). Both of the content removal requests were based on *'violation of personal rights'*.

5.31 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'*.

5.32 Medyascope

Two content removal request was submitted against Medyascope. One content was on both *'corruption-irregularities'* and *'misconduct'* and the plaintiff was a **minister**. The other story was about *'fraud'* and has a **business person** at its center. The orders were based on *'violation of personal rights'*.

5.33 Yeni1Mecra

Two content removal request was submitted against Yeni1Mecra news platform. One content was on both *'misconduct'* and *'corruption and irregularities'*. there was a person with the title of **senior bureaucrat** in the subject position. In other news, it was decided to remove it upon the application of a **civilian**. One order was issued for *'violation of personal rights'* and another for *'violation of presumption of innocence'*

5.34 140Journos

2 content published on 140Journos were decided to be taken off the air. The plaintiffs were a **senior bureaucrat** and a **senior political party member**. One of these reports was about *'corruption and irregularities'* and another was about *'misconduct'*. Decisions were taken within the framework of *'violation of personal rights'* and *'right to be forgotten'*.

5.35 BBC Turkish

It was decided to take it off the air for two news broadcasts in BBC Turkish. One of these reports was about *'assault and bodily harm'*. It was not known who the plaintiff of the news was.

5.36 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'*.

CONCLUSION

In the scope of the **Impact of Social Media Law on Media Freedom in Turkey Monitoring Report**, we classified 1197 content removal requests submitted to 36 media outlets from October 2020, the execution date of the Social Media Law, to October 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 (144 items), BirGün Daily (129 items) and ODA TV (98 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** (233 items), followed by **companies** (110 items) and **senior bureaucrats** (110 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*' (675 items) and '*misconduct*' (466 items). Besides, there were 202 news reports which reported on both offenses. The majority of the complainants against content on '*corruption and irregularities*' were **business people** (169 items) while most of the takedown orders against content on '*misconduct*' came from **senior bureaucrats** (49 items).
- According to data, 1080 out of 1197 takedown orders were based on '*violation of personal rights*'. Other common justifications mentioned in takedown orders include '*right to be forgotten*' (100 items) and '*damage to business reputation*' (91 items). The majority of the complainants who cited '*violation of personal rights*' were **business people** (231 items), while the complainants who cited '*right to be forgotten*' were **senior bureaucrats** (25 items). Most of the requests based on "*damage to business reputation*" were placed by **companies** (89 items).

- Among the news content involving **senior bureaucrats** (110 items), 102 news reports described allegations of '*corruption and irregularities*', while 49 news reports were about '*misconduct*'. The majority of the content removal requests were based on '*violation of personal rights*' (85 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: BirGün (17 items), Cumhuriyet (13 items), Sözcü Newspaper (13 items), Evrensel Daily (8 items), Karar Newspaper (7 items), İleri News (7 items) and Sol News (6 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 News (6 items), T24 (5 items), Artı Gerçek (5 items).
- **District governors** were the primary perpetrators in 38 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*' (38 items). The distribution of the content removal requests placed by district governors is as follows: BirGün (5 items) Gerçek Gündem (4 items), İleri News (4 items), Cumhuriyet (3 items), Sol News (3 items), Gazette Yolculuk (2 items),
- All of the requests of the **provincial director of national education** (26 items) who were plaintiffs for 25 contents that cover '*corruption-irregularities*' and '*misconduct*' were accepted on the grounds of '*violation of their personal rights*'. The distribution summary to institutions is as follows: BirGün (5 content), T24 (4 content), Yeniçağ Newspaper (3 contents).

● According to the research findings, **mayors** filed 23 content removal requests, 17 of which were reports of '*misconduct*'. Furthermore, 17 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 News (2 items), Cumhuriyet (2 item). BirGün Daily (2 items), Sözcü Newspaper (1 items).

● The news items which were taken to court by **prosecutors** (25 items) were primarily reports of '*corruption and irregularities*' (22 items), followed by content on '*misconduct*' (11 items). Furthermore, 8 news items cited both offenses. The most commonly used justification for these takedown orders was the '*violation of personal rights*' (25 items). The distribution of the content removal requests placed by prosecutors is as follows: BirGün Daily (5 items), Cumhuriyet (4 items), ODA TV (3 items), Gerçek Gündem (2 items), İleri News (2 items).

● In the scope of this research, 20 takedown orders placed by **judges** were identified. 15 of the reports were about '*misconduct*', 8 on '*corruption and irregularities*'. 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: dokuz8NEWS (3 items), Cumhuriyet (3 items), Sputnik Turkey (2 items), Sözcü Newspaper (2 items), Evrensel Daily (2 items), T24 (2 items).

● A review of the content removal requests placed by **members of the parliament** (16 items) revealed that this group particularly targeted content on '*corruption and irregularities*' (10 items) and '*misconduct*' (5 items). The contents of one were unknown while three news pieces were about '*assault and bodily harm*'. 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 Daily/BirGün Daily/ODA TV (2 items), T24/Sözcü Newspaper/Gazette Manifesto (1 item).

- When **Governors'** applications for the removal of a total 12 news was examined, it was seen that they were all '*misconduct*' (intertwined with the issue of '*corruption-irregularities*' in one report). At the same time, all decisions were taken on the grounds of '*violation of personal rights*'. **ODA TV** is the most content-removed broadcaster of governors with 2 content.
- The people under the title of **provincial police chief** have demanded the removal of 12 news, all of which are intertwined with '*corruption-irregularities*' and '*misconduct*'. All of the decisions were adopted on the grounds of '*violation of personal rights*'. The institution where decisions are distributed the most is Cumhuriyet (3 contents).
- Majority of the news reports that were taken to court by **senior military officials** (11 items) were reports of '*misconduct*' (10 items) and '*corruption and irregularities*'. (1 items). The majority of these takedown orders were based on '*violation of personal rights*' (11 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 Daily/ODA TV (1 item), T24/Cumhuriyet/Sputnik Turkey (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 Daily (1 item), Sözcü Newspaper (1 item), Artı Gerçek (1 item).
- The demands of **senior police officials**, all of whom were applied for the removal of 6 contents on '*corruption and irregularities*' and '*misconduct*', were accepted on the grounds of '*violation of their personal rights*'. Artı Gerçek was the medium where the decision to take the most off-air with 2 content
- All the reports that the **soldiers** (4 contents) were applied to the court for their removal were both about '*corruption and irregularities*' and '*misconduct*'. In all of the decisions, the reason was '*violation of personal rights*' and '*right to be forgotten*'. The distribution of news is as follows: Cumhuriyet (2 content), BirGün Daily (1 content), Evrensel (1 content).

- 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 Daily (2 items), SoL News (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: dokuz8NEWS (1 item), Yeniçağ Newspaper/Sözcü Newspaper (1 item)
- The requests of the **bureaucrats**, all of whom applied for the publication of two reports on '*misconduct*', was accepted on the grounds of violation of their personal rights. The requests were forwarded to BirGün Daily.
- It was understood that a **police officer** was the plaintiff to remove a news piece about '*harassment*'. The news was obtained on the grounds of '*violation of personal rights*' and published in BirGün Newspaper. A **deputy prosecutor's** report on '*misconduct*' was taken off the air for '*violation of personal rights*'. The decision was forwarded to the Sözcü Newspaper. A **chief physician's** report on '*misconduct*' has been dismissed for violating his personal rights. The decision was forwarded to the Gerçek Gündem institution.
- **Business people** (233 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*' (169 items), followed by '*misconduct*' (46 items), fraud (23 items) and '*murder*' (16 items). 231 out of 233 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 (29 items), T24 (20 items), BirGün Daily/ODA TV (19 items), Yeniçağ Newspaper (17 items), Gerçek Gündem (16 items), TELE1 (14 items), Halk TV (12 items) İleri News (10 items), dokuz8NEWS (10 items).

● **Civilians** (88 items) mostly filed applications take down news content on ‘*assault and bodily harm*’ (27 items), ‘*suicide*’ (16 items) and ‘*fraud*’ (12 items). The most commonly cited justifications by **civilians** include ‘*violation of personal rights*’ (62 items), ‘*privacy*’ (28 items) and ‘*right to be forgotten*’ (13 items). The distribution of the takedown requests filed by **civilians** is as follows: Sözcü Newspaper/Cumhuriyet (8 items), BirGün Daily (7 items), T24/Evrensel (6 items), Sputnik TR/dokuz8NEWS/ODA TV/TELE1/ABC Newspaper (5 items).

● **Lawyers** submitted 81 content removal requests, including 47 news articles on ‘*corruption and irregularities*’ and 35 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 News (9 items), BirGün Daily/Cumhuriyet (8 items), ODA TV (7 items), Gerçek Gündem (6 items), TELE1/T24/Yeniçağ Newspaper/ABC Newspaper/İleri News(5 items).

● According to research findings, **senior members of political parties** (51 items) primarily targeted news content on ‘*misconduct*’ (36 items). It was followed by ‘*political conflict*’ with 11 contents, ‘*corruption and irregularities*’ with 7 contents, ‘*harassment*’ with 6 contents. In addition, both ‘*misconduct*’ and ‘*harassment*’ were intertwined in the six contents. The majority of the content removal requests were based on ‘*violation of personal rights*’ (50 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 Newspaper/Cumhuriyet (7 items), Evrensel Daily /Yeniçağ Newspaper/ODA TV (5 items) dokuz8NEWS (4 items).

- **Academics** were identified as perpetrators in 50 news reports that were targeted by content removal requests, including 27 articles on *'misconduct'*, 13 articles on *'corruption and irregularities'* and 9 news reports on *'murder'*. Majority of the requests submitted by academics were approved by courts on the basis of *'violation of personal rights'* (48 items). Nine contents - all of which have been used together for *'violations of personal rights'* - show the reason for the *'right to be forgotten'*. The distribution of these requests across media outlets is as follows: BirGün Daily (8 items), Cumhuriyet (7 items), Sözcü Newspaper (6 items), ODA TV (5 items), T24 (4 items).
- 12 *'harassments'*, 8 *'murders'* and 5 *'assault and bodily harm'* were reported by people in the position of **defendants** (25 contents); 17 of the decisions were taken in *'violation of their personal rights'* and 8 were taken within the framework of the *'right to be forgotten'*. The distribution of decisions by broadcasters is as follows: Cumhuriyet/BirGün (5 items), T24 (4 items), ODA TV (2 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 Newspaper (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 Newspaper (1 item), BirGün Daily (1 item), Cumhuriyet (1 item), T24 (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.

- It were determined that people with the title of **doctor** have made a decision to remove it for 4 contents. All of news was about '*misconduct*'. The decisions were based entirely on the grounds of '*violation of personal rights*', '*right to be forgotten*' and '*absence of public interest*'. BirGün/T24/SoL/Karar Newspaper (1 item)
- As a legal entity, it has been observed that '*corruption and irregularities*' are present in 100 of the reports in **companies** (110 contents) were suing for publication. *Political conflict* (34 items), '*fraud*' (16 items) and '*environmental damage*' (5 items) news follow the topic. All news on '*political conflict*' and all reports on '*fraud*' were intertwined with the issue of '*corruption and irregularities*'. Prohibition decisions were mostly taken based on '*violations of personal rights*' (96 items) and '*damage to commercial reputation*' (89 items). In total, these two reasons were used together in 75 contents. Removal decisions were distributed to institutions as follows: Gerçek Gündem (12 items), BirGün (10 items), Evrensel/Cumhuriyet/Halk TV (8 items), dokuz8NEWS/ ODA TV/T24 (7 items)
- As a legal entity, the **university** (3 contents) has requested the removal of two reports intertwined with the subjects of '*misconduct*' and '*corruption and irregularities*'. One subject of a news pieces could not be classified. The court ruled that all news should be taken off the air on the grounds of '*violation of personal rights*'. All of the decisions have been communicated to BirGün Daily
- **Gendarmerie** has filed a claim to remove 3 reports of misconduct. The reports taken from the publication on the grounds of '*terrorist propaganda*' (all about '*misconduct*'). The news was published on the Evrensel Newspaper.
- A **foundation** has applied for a report on '*corruption and irregularities*.' The news about '*corruption and irregularities*' was taken off the air for '*violations of personal rights*'. The news was published on BirGün Daily.

7.1 Policy Recommendations

The Impact of Social Media Law on Media Freedom in Turkey Monitoring Report demonstrates that law is being used as an instrument to block media coverage about illegal acts of ‘privileged’ individuals, 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 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, 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.

REFERENCES

Aras, Ü. Y. (2010). İnsan Hakları Temelinde Özel Hayat Hakkının Ulusal ve Uluslararası Alanda Uygulamaları (Doctoral Dissertation, Bahçeşehir Üniversitesi Sosyal Bilimleri Enstitüsü).

Değirmencioğlu, B. AİHM İctihatları Işığında "Masumiyet Karinesi"nin Korunması. Ankara Sosyal Bilimler Üniversitesi Hukuk Fakültesi Dergisi, 1(2), 307-356.

Gül, İ. (2014). Danıştay Kararlarında "Kamu Yararı" Kavramı. Ankara Barosu Dergisi, (2), 533-552.

Gülsün, R. (2015). İnsan Onuru ve Lekelenmeme Hakkı. International Journal of Legal Progress, 1(2), 17-42.

Kaufmann, D., & Vicente, P. C. (2005). Legal Corruption.

Kaya, M. (2010). Telekomünikasyon Alanında Kişilik Haklarının Korunması. Ankara Barosu Dergisi, (4), 279-334.

Nalbantoğlu, S. (2018). Bir Temel Hak Olarak Unutulma Hakkı. Türkiye Adalet Akademisi Dergisi, (35), 583-605.

Okuyucu-Ergün, G. (2009). Görevi Kötüye Kullanma Suçu. Türkiye Barolar Birliği Dergisi, (82), 139-169.

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