



Last Call for Fulfilling the Registration Obligation with VERBIS!

Under Turkish law, data controllers must be registered with the so-called “VERBIS” registration system before processing any personal data. The Turkish Personal Data Protection Authority announced December 31, 2021 as the final deadline for fulfilling this registration obligation pursuant to the Personal Data Protection Law No. 6698 and the Regulation on Data Controllers Registry. The deadline is fast approaching.

In this respect, the following data controllers must register with VERBIS until the end of this year:

- Individual and legal entity data controllers residing in Turkey and having more than 50 employees or having a total annual balance sheet above 25 million Turkish Liras (approx. 2,012,000 US\$);
- Individual and legal entity data controllers residing outside of Turkey;
- Individual and legal entity data controllers, whose main field of activity is processing sensitive personal data (*e.g.*, health data, membership of associations, religion), despite they have less than 50 employees and a total annual balance sheet below 25 million Turkish Liras (approx. 2,012,000 US\$);
- State institutions and organizations, and professional organizations having public institution status.

Failing to fulfil registration obligation until December 31, 2021, would result in administrative fine between 39.337 Turkish Liras (approx. 3,170 US\$) and 1.966.862 Turkish Liras (approx. 158,300 US\$). Accordingly, please be informed that data controllers which are subject to VERBIS registration obligation as noted above and have not yet registered with VERBIS should prepare their data processing inventories and complete the registration within December, 2021.

The Authority’s Guideline for Data Controllers’ Registry Information System can be reviewed [here](#) for detailed information on the registration process [available in Turkish only].

For further information please contact:



Dr. Zahide Altunbaş Sancak
z.sancak@guleryuz.av.tr



M. Tarık Gülerüz
t.guleryuz@guleryuz.av.tr

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