



Turkish DPA's Decision on Appointment of Same Contact Person for Data Controllers Registry

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Turkish Personal Data Protection Board (“Board”) published a decision¹ (2020/542) at the Data Protection Authority’s (“DPA”) website on September 8, 2020 regarding appointment of the same real person as a contact person for registration to the Data Controllers Registry.

I. The Issue Brought Before the Board

According to the decision, several data controllers complained about the fact that they need to appoint different real persons for each entity residing outside of Turkey, stating that this is burdensome for them. Accordingly data controllers asked the DPA to render an opinion on appointment of the same real person as the contact person for multiple one data controllers and to implement the necessary technical adjustments on the Data Controllers Registry Information System (VERBIS).

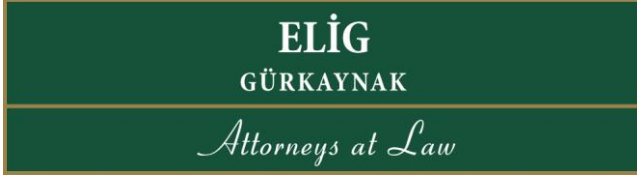
II. Board’s Evaluations

In its decision of July 16, 2020 with number 2020/542, the Board made the following conclusions:

(i) The same real person can be appointed as the contact person for multiple data controllers that reside outside of Turkey.

(ii) Data controllers residing in Turkey cannot appoint the same real person as their contact person.

¹ <https://kvkk.gov.tr/Icerik/6797/2020-542>



Accordingly the Board, by taking into account the complaints and applications received due to practical difficulties, provided an exception to the prohibition on appointment of the same real person contact person, for only the data controllers residing outside of Turkey.

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