

Turkish Data Protection Board: A Single Person may be Appointed as the Contact for more than One Data Controller Residing Abroad

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Turkish Data Protection Board ("**Board**") decided that a single person may be appointed as the contact person for multiple data controllers abroad at the same time. However, a person can be a contact person for only one data controller in Turkey.

Previously, Data Controllers Registry Information System ("**VERBİS**") allowed a person to be appointed as representative of multiple data controllers abroad simultaneously; however, it was not possible to appoint one contact person for multiple data controllers abroad. An application is made to the Board for resolving this contradiction and making necessary technical alterations in VERBİS.

For data controllers in Turkey, the contact person is responsible for carrying out all communication with the Board and carry out all VERBİS proceedings. If any change occurs in the registered information and data processing activities, necessary VERBİS should be updated in 7 days at the latest. Since the contact person should have comprehensive and detailed information as to data processing activities in order to make this alteration, Board had decided that a person could be appointed as the contact person for only one data controller residing in Turkey.

For data controllers residing abroad; however, the Board considered the difficulty of finding and appointing a legal or natural person with sufficient expertise in both data protection legislation and communication with the data controllers. In this respect, the Board decided to allow a legal or natural person to become representative of more than one data controllers abroad at the same time.

As the representative is the actual person responsible for carrying out communication with the Board, and the contact person, appointed by the representative, is the one who would carry out the VERBİS proceedings, appointing the same contact for multiple data controllers was deemed appropriate by the Board.

You may reach the full text of the decision dated 16 July 2020 and numbered 2020/542, published on the Board's official website on 9 September 2020 at this [link](#) (only available in Turkish).

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