



**The EU-Türkiye Joint Consultative Committee (JCC)**

**REPORT**

**Digital transformation: Economic, social and governance dimensions**

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## **1. Introduction**

Türkiye is undergoing one of the most consequential digital transformations among major emerging economies. Situated at the crossroads of Europe and Asia, the country is simultaneously a candidate for EU accession, a G20 economy and a state with its own distinctive approach to technological sovereignty. This report, prepared in the framework of the EESC-Türkiye Joint Consultative Committee (JCC), analyses the economic, social and governance dimensions of that transformation, paying particular attention to the role of women, education, young people and employment. The report also highlights where the Turkish digital transformation converges with and diverges from the European digital framework, particularly in the areas of data governance, artificial intelligence and cybersecurity, and identifies best practices that provide mutual learning opportunities for civil society and the productive sector.

## **2. Context of EU-Türkiye cooperation**

Digital transformation is fundamentally reshaping economies, labour markets and societies at an unprecedented scale and speed. It is no longer a purely technological process, but a systemic transformation that affects production models, governance structures social cohesion and democratic resilience.

For both the European Union and Türkiye, digital transformation represents a strategic priority with far-reaching implications. It is central to economic competitiveness, innovation capacity and global positioning, while also raising complex challenges relating to labour market disruption, social inequality, regulatory adaptation and technological dependence.

EU-Türkiye cooperation in this field is taking place in a broader geopolitical context marked by intensified global competition, technological fragmentation and the growing importance of strategic autonomy. The rapid advancement of key technologies, such as artificial intelligence, data-driven innovation and advanced digital infrastructure, has reinforced the need for coordinated approaches that balance competitiveness with social fairness and democratic values.

In this context, digital transformation between the EU and Türkiye has evolved into a strategic necessity, moving beyond simple technological adoption to become a core pillar of their economic, social and governance relationship in 2026.

## **3. Importance of digital transformation**

The European Union has positioned itself as a global standard-setter in digital governance, promoting a human-centric model grounded in trust, fundamental rights, transparency, accountability, and ethical innovation. As a candidate country and key economic partner, Türkiye has made significant progress in digital infrastructure, e-government services and innovation ecosystems, while continuing to develop its regulatory and institutional frameworks.

Strengthening EU-Türkiye dialogue and cooperation on digital transformation is both timely and necessary. It offers an opportunity to strengthen economic ties and competitiveness, promote regulatory convergence and reduce fragmentation, support inclusive growth and social cohesion, and enhance resilience in an increasingly uncertain global environment. EU-Türkiye digital cooperation is increasingly characterised by functional integration in areas such as trade, standards and e-governance, even as broader political alignment remains a work in progress.

## 4. The architecture of Türkiye’s digital transformation

### 4.1. Strategic Planning Framework

Türkiye’s digital transformation is not a sectoral policy only but is considered a multidimensional national priority embedded in its highest-level planning instruments. The 12th Development Plan (2024-2028)<sup>1</sup> positions digitalisation as one of the primary drivers of economic growth, mandating the widespread adoption of AI, big-data cloud computing and the Internet of Things. A Medium-Term Programme (2024-2026)<sup>2</sup> reinforces this by linking the digital and green transitions to macroeconomic stabilisation. Other initiatives, such as the Technology Move Programme<sup>3</sup>, aim to develop domestic technologies and upgrade innovation capacity in strategic sectors.

A distinctive feature of Türkiye’s approach, compared to the EU, is the strong link between digital ambitions and defence-industrial sovereignty. A dense connection between domestic technology use and the development of a high-tech defence industry is visible, a coupling that sets the Turkish model apart from most European counterparts. Digital transformation is thus conceived not only as an economic modernisation tool but also as a pillar of national security and geopolitical autonomy.

From these perspectives, the EU and Türkiye could collaborate in the development of big data infrastructure and establish partnerships that may prove beneficial for both parties, particularly in a global environment where major technology companies are predominantly located outside Europe.

### 4.2. Connectivity and infrastructure

Türkiye has made significant infrastructure advances in terms of access to and use of digital tools. The development of digital public services plays a crucial role, with Türkiye demonstrating strong performance in e-government solutions, notably through the e-Devlet platform, which in some areas compares favourably with several EU Member States. Individual internet usage in Türkiye stands at 90.9%, and 76.1% of individuals use e-government services<sup>4</sup>, a remarkable adoption rate driven by the platform.

The official launch of 5G took place on 31 March 2026<sup>5</sup>, marking the beginning of a new connectivity era. The rollout is starting in all 81 provincial centres, with full nationwide coverage

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<sup>1</sup> T.C. Cumhurbaşkanlığı Strateji ve Bütçe Başkanlığı, On İkinci Kalkınma Planı (2024-2028), Dijital Gelişmelerin Sosyoekonomik Etkileri Çalışma Grubu Raporu (Temmuz 2023) [https://www.sbb.gov.tr/wp-content/uploads/2025/08/Dijital-Gelismelerin-Sosyoekonomik-Etkileri-CG-Raporu\\_01082025.pdf](https://www.sbb.gov.tr/wp-content/uploads/2025/08/Dijital-Gelismelerin-Sosyoekonomik-Etkileri-CG-Raporu_01082025.pdf)

(Presidency of the Republic of Türkiye, Presidency of Strategy and Budgetary. Twelfth Development Plan (2024–2028) Working Group Report on the Socioeconomic Impacts of Digital Developments (July 2023).

<sup>2</sup> T.C. Cumhurbaşkanlığı Strateji ve Bütçe Başkanlığı, Orta Vadeli Program (2024-2026) (Eylül 2023). <https://www.resmigazete.gov.tr/eskiler/2023/09/20230906M1-1.pdf>

<sup>3</sup> Teknoloji Hamlesi Programı (The Technology Move Program) <https://www.hamle.gov.tr/>

<sup>4</sup> Türk İstatistik Kurumu (TÜİK), Hanehalkı Bilişim Teknolojileri (BT) Kullanım Araştırması, 2025 (Turkish Statistical Institute (Household ICT Usage Survey, 2025). <https://veriportali.tuik.gov.tr/press/53925>

<sup>5</sup> “5G ile İletişimde Güçlü Türkiye Töreni”, 31 Mart 2026, T.C. Cumhurbaşkanlığı İletişim Başkanlığı (5G Launch Ceremony, 31 March 2026, Republic of Türkiye, Presidency of Communications). <https://www.iletisim.gov.tr/turkce/haberler/detay/cumhurbaskani-erdogan-5g-ile-iletisimde-guclu-turkiye-torende-konustu>

planned within two years, beginning with rural areas in an inclusive-by-design approach. The technology is also due to be integrated into public security systems and law enforcement.

The EU sees 5G as a major opportunity for innovation, economic growth, and faster digital services, but it is also concerned about the security risks linked to these networks. In particular, the EU worries that 5G infrastructure could become vulnerable to cyberattacks, espionage, or supply-chain dependence if too much of it relies on a small number of vendors<sup>6</sup>. To address these concerns, the EU encourages a coordinated approach across member states, as well as with the partners, with stronger security standards, careful risk assessment, and diversification of suppliers. From this perspective, the EU and Türkiye could initiate a cooperation on 5G security, interoperability, and standards alignment through joint technical working groups, regular information-sharing on cyber risks, and pilot projects in trusted infrastructure development. This would support Türkiye's 5G rollout while helping both sides build a more resilient and secure digital ecosystem based on sharing knowledge and experiences.

### **4.3. The ICT sector and ecosystem**

Türkiye has developed dynamic and rapidly growing innovation ecosystems, particularly in sectors such as fintech, gaming, defence technologies and e-commerce. Its strong entrepreneurial culture and growing pool of skilled professionals provide a solid foundation for further development. At the same time, increasing emphasis is placed on aligning technological development with European standards, particularly in the context of supply chain integration and industrial modernisation.

The ICT sector in Türkiye offers significant potential for economic growth and cooperation. The total sector reached approximately EUR 22.8 billion in 2024, with an average annual growth rate of around 59% between 2020 and 2024<sup>7</sup>. A slight dominance, in terms of market size, of information technologies over communication technologies reflects a structural shift from hardware towards software and services.

Both in the EU and in Türkiye, the digital transformation has increasingly been shaped by the so-called 'dual transition', reflecting the simultaneous shift towards green and digital economies, which is redefining industrial strategies and investment priorities on both sides. Despite these strengths, both sides face common challenges, including limited scale-up capacity, restricted access to risk capital and barriers to cross-border innovation cooperation. Addressing these challenges requires targeted policies that facilitate the transition from innovation to market deployment.

In this context, digital connectivity should also be considered an important component of deeper economic and technological integration. Currently, Türkiye is not included in the EU roaming framework, which has been in operation across the EU since 2017. Extending roaming cooperation to Türkiye could facilitate cross-border communication, reduce operational costs for businesses and individuals, and contribute to stronger economic and social interaction between the parties.

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<sup>6</sup> European Commission, Directorate-General for Communications Networks, Content and Technology, 5G Observatory Report June 2025.

<sup>7</sup> TÜBİSAD, Information and Communication Technologies Sector 2024 Market Data (May 2025). <https://www.tubisad.org.tr/tr/images/pdf/tubisad-ict-en-11062025.pdf?v2>

## 5. Governance and institutional framework

### 5.1. Key institutions and regulatory architecture

Türkiye's digital governance architecture is multi-ministerial and has been recently restructured. A significant institutional change occurred in March 2025, when the Presidency's Digital Transformation Office (CBDDO), established to coordinate government-wide digital policy, was abolished by Presidential Decree No.183<sup>8</sup> and its functions transferred to the newly-created Presidency of Cybersecurity. This consolidation signals a shift in emphasis towards security-centric digital governance, merging transformation and security mandates under a single authority. The new office is expected to bridge the gap between strategic objectives and the quantitative steps needed to translate the aforementioned Development Plan's indicators into concrete outcomes.

### 5.2. Legal framework and governance

The Digital Transformation Index<sup>9</sup> indicates continuing challenges in the areas of legal framework and governance, factors which may influence the confidence of both domestic and foreign digital investors.

Türkiye adopted its data protection regulation (KVKK) in 2016 and has been implementing it ever since, a more comprehensive law equivalent to the GDPR has notably been absent from the operational legislative landscape. Nevertheless, a number of amendments have been made to the KVKK since 2024. These include amendments to the rules relevant to the processing of special categories of personal data, amendments that strengthen data subjects' rights, and rules regarding international data transfers, similar to the GDPR. Furthermore, efforts are ongoing to make the two laws compatible.

Institutional coordination between public bodies, NGOs, the private sector and universities could foster co-creation of coherent digital strategies. . Multi-stakeholder governance – a cornerstone of the European digital policymaking model – remains opaque in Türkiye. The active participation of civil society organisations, social partners, academia and businesses can contribute to more effective, trusted and inclusive digital governance frameworks."

Türkiye lacks a comprehensive AI regulation, akin to the EU's AI Act, even though Türkiye's AI strategy contains some relevant indicators and objectives.

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<sup>8</sup> "Bazı Cumhurbaşkanlığı kararnamelerinde değişiklik yapılmasına dair Cumhurbaşkanlığı kararnamesi", 28 Mart 2025, 32855. (Presidential decree no. 183 on the amendment of certain presidential decrees). <https://www.resmigazete.gov.tr/eskiler/2025/03/20250328-11.pdf>

<sup>9</sup> TÜBİSAD, Türkiye'nin Dijital Dönüşüm Endeksi 2025 (Digital Transformation Index 2025). <https://www.tubisad.org.tr/tr/images/pdf/dde-2025-raporu.pdf?v2>

## 6. Social dimensions: women, young people, education and employment

### 6.1. Education and digital skills

Both the EU and Türkiye face persistent skills gaps, highlighting the need for stronger education systems, closer links between training and labour market needs, and accessible lifelong learning opportunities. In particular, the shortage of ICT specialists remains a shared challenge, with the European Union setting an ambitious target of reaching 20 million specialists by 2030 under the Digital Decade framework<sup>10</sup>, while Türkiye is increasingly focusing on embedding digital literacy and advanced skills within its national education and vocational training systems.

Public education spending as a share of GDP stands at 2.6% – well below the upper-middle-income country average of 4.9% and the global average of 4.5%.<sup>11</sup> Türkiye allocates only 6.7% of its education budget to early childhood education (among the lowest globally), while directing 34.1% to higher education (among the top three globally) – an inversion of the investment logic endorsed by international bodies.<sup>12</sup>

A current amendment<sup>13</sup> in the Law No. 5651 on the Regulation of Publications Made on the Internet and the Fight Against Crimes Committed Through Such Publications prohibits social media platforms from serving users under 15 years old. This approach reflects a protective governance approach consistent with emerging European debates on children's digital rights.

In the Digital Transformation Index<sup>14</sup>, Türkiye ranks in the bottom five among 21 benchmarked countries in terms of its number of STEM graduates, ICT employment and ICT service exports – three interconnected indicators that reflect a weak science-to-industry pipeline. Improving mathematics and science education quality, redesigning curricula from primary school upwards in line with industry needs and expanding lifelong learning mechanisms for reskilling are identified as systemic priorities.

AI usage in Türkiye is closely correlated with education level: 36.1% of higher education graduates use AI tools<sup>15</sup>, which calls for, on the one hand, targeted ethical and legal safeguards for specific groups and sectors and, on the other hand, stronger digital literacy and employability measures in the emerging digital economy. Digital literacy should also support the responsible, informed and safe use of digital technologies and online platforms."

### 6.2. Women and digital inclusion

Several initiatives in Türkiye aim to include and protect women in the digital transformation, demonstrating how technology can be integrated into sensitive areas such as safety and

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<sup>10</sup> Decision (EU) 2022/2481 of the European Parliament and of the Council of 14 December 2022 establishing the Digital Decade Policy Programme 2030 (OJ L 323, 19.12.2022, p. 4-26).

<sup>11</sup> TÜSİAD, Türkiye'de Eğitim Harcamaları:Geleceğin Dünyasına Hazırlanırken Eğitimin Bütçesi (haz. Özgenur Korlu) Güncellenmiş Baskı, Kasım 2025 (Yayın No. TÜSİAD - T/2025-10/653) (Education Expenditures in Turkey (November 2025). Publication No. T/2025-10/653)

<sup>12</sup> ibid.

<sup>13</sup> 7578 Sayılı Sosyal Hizmetler Kanunu ve Bazı Kanunlarda Değişiklik Yapılmasına Dair Kanun, 1 May 2026 (Law No. 7578 Amending the Social Services Act and Certain Other Laws, 1 May 2026). <https://www.resmigazete.gov.tr/eskiler/2026/05/20260501-1.htm>

<sup>14</sup> TÜBİSAD, Türkiye'nin Dijital Dönüşüm Endeksi 2025 (Digital Transformation Index 2025) <https://www.tubisad.org.tr/tr/images/pdf/dde-2025-raporu.pdf?v2>

<sup>15</sup> TÜİK, Yapay Zeka İstatistikleri 2025 (AI Statistics 2025). <https://veriportali.tuik.gov.tr/tr/press/57945>

employment. The ‘Women Shaping the Future’ programme<sup>16</sup>, a partnership between Turkcell, the Presidency’s Digital Transformation Office (CBDDO) and TOBB, has become one of the most comprehensive initiatives since 2025 targeting women’s employment and digital skills development. This public-private-civil society tripartite model is a promising best practice.

The KADES emergency support system for women<sup>17</sup>, now being upgraded through 5G infrastructure, illustrates how digital public services can be specifically designed to address gender-based vulnerabilities. Türkiye’s TOBB Women Entrepreneurs Council, founded in 2007, has long been a structural actor in promoting women’s economic participation and its engagement with digital transformation is deepening.

Nevertheless, the available indicators reveal a continuing structural inequality between men and women, as women participate in the labor force and employment at significantly lower rates while experiencing higher levels of unemployment, including in fields related to STEM<sup>18</sup>, similar to the situation in the EU, and targeted policies to convert awareness into structural change are still developing.

### **6.3. Young people, employment and entrepreneurship**

In the last few years, the digital transformation has been driven by the adoption of AI technologies at professional and individual level in Türkiye. Young people are at the forefront of AI adoption: 39.4% of the 16-24 age group use AI tools<sup>19</sup>, the highest rate of any demographic. This creates a generational digital divide that has positive and negative dimensions – high adoption potential but also higher exposure to algorithmic risks, misinformation and the psychological effects of social media dependency.

Türkiye's TEKNOFEST – a national technology and aerospace festival attracting approximately one million visitors annually – has become a flagship mechanism for youth engagement with STEM and innovation.<sup>20</sup> This event-driven model for mobilising young people around science and technology has few European equivalents at this scale and represents a genuine best practice in innovation culture building.

On employment, reports<sup>21</sup> estimate that over 400 startups in Türkiye have a combined potential valuation of EUR 1-3 billion, and that the proper deployment of AI could add 1% annually to GDP. Yet the barriers to scaling – such as talent shortages, organisational culture and limited access to venture capital – echo the challenges also facing many EU Member States.

Brain drain is explicitly identified as a strategic risk in the 12th Development Plan<sup>22</sup>, with calls for incentives to retain highly skilled professionals and attract diaspora talent back. This mirrors longstanding concerns in several EU Member States.

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<sup>16</sup> Türkiye Yapay Zeka İnisyatifi (TRAI), Aktivite Raporu, Ocak 2026 (Türkiye Artificial Intelligence Initiative, Activity Report, January 2025) <https://turkiye.ai/wp-content/uploads/2026/01/Faaliyet-Raporu.pdf>

<sup>17</sup> Supra note 5

<sup>18</sup> TÜİK, Türkiye'de İstatistiklerle Kadın 2025 (Women in Türkiye: A Statistical Overview 2025) [https://www.tuik.gov.tr/media/announcements/ist\\_kadin2025.pdf](https://www.tuik.gov.tr/media/announcements/ist_kadin2025.pdf)

<sup>19</sup> Supra note 15.

<sup>20</sup> <https://teknofest.org/tr/>

<sup>21</sup> supra note 1 and 12.

<sup>22</sup> Supra note 1.

## 7. Artificial intelligence: strategy, adoption and risk

AI has been one of the main driving factors of Türkiye's digital transformation in the last couple of years, in line with global trends. Several initiatives have been launched in this field to speed up Türkiye's integration of AI technologies and to enable benefits across multiple areas.

### 7.1. National AI strategy and institutions

The national Strategy as an integrated part the 12th Development Plan, identifies AI as central to achieving economic modernisation, public sector efficiency and technological sovereignty. Agentic AI – autonomous, multi-task AI systems – is identified as a primary trend for 2025 and beyond, with early adoption concentrated in HR, IT and sales applications, particularly in policy and industry debates.<sup>23</sup>

The strategic narrative frames AI adoption as a tool for both economic growth and public sector savings.

### 7.2. AI adoption in businesses and society

AI adoption by businesses has accelerated, albeit from a low base. The share of firms using any AI technology has grown, with large firms (250+ employees) leading in adoption, while smaller firms (10-49 employees) remain far behind.<sup>24</sup> The information and communications sector leads, with 47.1% of firms reporting adoption of AI technologies.<sup>25</sup>

Another report notes that approximately 75% of companies plan to integrate generative AI within two years, with 45% intending to allocate more than 10% of IT budgets to AI.<sup>26</sup> At the same time, 88% of companies closely monitor AI ethics and regulatory developments – a high level of awareness that has not yet translated into formal governance structures.<sup>27</sup>

A corporate survey reveals that only 37.6% of institutions have approved and implemented an AI strategy; most remain in preparatory or draft stages.<sup>28</sup> A central finding is that the main barriers to AI scaling are not technological but human: talent shortages and organisational culture.

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<sup>23</sup> TÜSİAD, GenAI: Ready or Not? Perspectives on talent, leadership and cultural transformation July 2025 Publication No. TÜSİAD - T/2025-07/651. <https://tusiad.org/tr/yayinlar/raporlar/item/11816-genai-ready-or-not-perspectives-on-talent-leadership-and-cultural-transformation>

See also; Taş, H. & Zümrüt Boyacıoğlu, E. (2025). Türkiye'nin dijitalleşme vizyonu: Stratejik belgelerde teknoloji ve inovasyon (Türkiye's Digitalization Vision: Technology and Innovation in Strategic Documents). Bursa Uludağ Üniversitesi İktisadi ve İdari Bilimler Fakültesi Dergisi, 44(2), 125-146. <https://dergipark.org.tr/tr/download/article-file/5378211>

<sup>24</sup> Supra note 15.

<sup>25</sup> ibid.

<sup>26</sup> TÜSİAD, Üretken Yapay Zeka Devrimi: Küresel Etkiler ve Türkiye'nin Konumu (haz. Gediz CÜRGÜL, Mehmet Nuri İNEL, Alp Kartal GÜREL) Nisan 2025 (The Generative AI Revolution: Global Impacts and Türkiye's Position, April 2025). <https://tusiad.org/tr/yayinlar/raporlar/item/11785>

<sup>27</sup> ibid.

<sup>28</sup> TRAI Kurumsal Yapay Zeka Araştırması, Ekim 2025 (Corporate AI Research, October 2025). <https://turkiye.ai/yapay-zeka-arastirmasi/>.

Over 45% of Türkiye’s digital economy output and technology investments are concentrated in the Marmara region, creating regional inequalities that are more pronounced than in most EU Member States.<sup>29</sup>

At the individual level, ChatGPT dominates, with an 82.8% usage rate among AI tool users. Generative AI usage reached 19.2% of the population by 2025, comparable to or above many EU Member States.<sup>30</sup>

### 7.3. AI-related opportunities and risks

Artificial intelligence has the potential to generate substantial productivity gains, strengthen industrial competitiveness, and accelerate innovation across the economy. By enabling the automation of repetitive tasks, optimizing production processes, and supporting advanced data analysis, AI can improve efficiency and reduce costs in both the public and private sectors. At the same time, AI creates opportunities for the development of new products, services, and business models, helping industries remain competitive in rapidly evolving global markets. Beyond its economic impact, AI can also support more responsive public services, enhance access to knowledge, and contribute to improved quality of life through innovative solutions to social challenges. On the contrary, AI technologies pose risks relating to potential unemployment and inequality, data privacy, algorithmic bias, lack of transparency and explainability (the ‘black box’ problem), deepfakes and disinformation, uncontrollable AI, erosion of human capabilities, AI-powered cyberattacks and the environmental footprint of large models.

General opportunities and risks of AI systems are also visible in Türkiye. In addition, public perception surveys reveal a cautious society: 53.7% of AI users feel cautious, 66% are worried about unethical use and 62.7% fear personal data misuse, pointing to strong demand for protective regulation.<sup>31</sup> Regulation emphasising transparency, accountability, ethical oversight bodies and international cooperation would align with the EU AI Act’s risk-based approach, since Türkiye lacks a binding AI regulation equivalent.

The need to ensure Europe’s strategic autonomy, both in economic and geopolitical terms, necessitates the development and deployment of a sovereign European artificial intelligence model. Achieving this objective requires robust public–private partnerships at both the European and Member State levels, built around a coordinated and jointly implemented initiative. The current global competitive dynamic—characterised by private actors investing in large-scale data centres for AI training, with significant energy and water consumption—raises serious concerns regarding long-term sustainability.

A second essential pillar is the establishment of an appropriate regulatory framework that, while safeguarding technological innovation, ensures the protection of citizens, upholds the common interest, and reinforces democratic governance. In this regard, the European Union remains the

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<sup>29</sup> TÜSİAD, Rekabetin Yeni Dinamiği: Sanayide Teknolojik Dönüşüm (haz. Selin ARSLANHAN, Sibel GÜVEN, Güven SAK), Mart 2025, Yayın No. TÜSİAD - T/2025-03/645. (The New Dynamics of Competition: Technological Transformation in Industry). <https://tusiad.org/tr/yayinlar/raporlar/item/11767-rekabetin-yeni-dinamigi-sanayide-teknolojik-donusum>

<sup>30</sup> Yapay Zeka Politikaları Derneği (AIPA) ve Kuantum Araştırma, Gelecek Araştırması Toplumda Yapay Zeka Algısı-2, Aralık 2025 (AI Perception Research, December 2025). [https://aipaturkey.org/media/pdfs/YapayZeka\\_AlgıArastirmasi\\_2025\\_Toplum.pdf](https://aipaturkey.org/media/pdfs/YapayZeka_AlgıArastirmasi_2025_Toplum.pdf)

<sup>31</sup> TRAI, Yapay Zeka Risk Raporu, Ağustos 2025 (Artificial Intelligence Risk Report, August 2025). <https://turkiye.ai/trai-yapay-zeka-risk-raporu-2025/>

most advanced jurisdiction globally. In this context, the EU should also consider proposing structured cooperation with Türkiye as part of a broader common European AI project.

## **8. Data governance and cybersecurity**

### **8.1. Data sovereignty and the regulatory gap**

Data governance represents both a strategic priority and an institutional vulnerability in Türkiye's digital model. The 12th Development Plan explicitly prioritises data sovereignty – ensuring that data generated on national infrastructure can be processed and governed domestically – as a security, economic and regulatory imperative.

From a personal data protection perspective, as indicated earlier, Türkiye's framework has been developing. Remaining regulatory divergences may create challenges for EU-Türkiye data flows, limits the country's potential participation in European digital single market instruments and exposes Turkish citizens to weaker rights. Strengthening trust in digital ecosystems requires effective safeguards for personal data, transparency in data processing and accessible mechanisms for redress.

### **8.2. Cybersecurity strategy**

Türkiye's National Cybersecurity Strategy and Action Plan (2024-2028)<sup>32</sup> establishes a comprehensive framework covering critical infrastructure protection, incident response, threat intelligence and international cooperation. The 12th Development Plan frames cybersecurity as a dimension of national security, technological sovereignty and global competition, going beyond technical security to encompass strategic and investment dimensions.

An increase in phishing attacks and malware has been observed in recent years, reinforcing the need for cybersecurity strategies, aligned with EU approaches, which keep pace with digital infrastructure expansion. AI-powered cyberattacks are identified as a key emerging threat, one that Türkiye's national strategy must continuously adapt to in order to address.

The newly established Presidency of Cybersecurity is expected to make tangible steps towards addressing these challenges.

## **9. Conclusions and recommendations**

Türkiye's experience shows that a fast, state-driven digital transformation is possible even in a complex geopolitical and economic context. Digitalisation has been placed at the heart of national development planning, with a strong emphasis on technological sovereignty, domestic capabilities and integration between security and digital policy.

In key areas such as internet connectivity, e-government uptake, early adoption of AI tools and the launch of 5G, Türkiye already performs at or above the level of several EU Member States, demonstrating a significant capacity for rapid mobilisation and implementation. AI- and 5G-

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<sup>32</sup> Republic of Türkiye Ministry of Transport and Infrastructure, National Cybersecurity Strategy and Action Plan 2024–2028. <https://hgm.uab.gov.tr/uploads/pages/siber-guvenlik/national-cyber-security-strategy-2024-2028.pdf>

specific ethical and security challenges should be taken into consideration, and close cooperation between the European Union and Türkiye on how to address these challenges is recommended.

At the same time, this rapid progress opens a window of opportunity for a more strategic deepening of EU-Türkiye cooperation. Rather than focusing on gaps or deficits, the next phase could build on complementarities. Türkiye brings to the table a dynamic entrepreneurial ecosystem, certain levels of citizen engagement with digital public services, and innovative platforms for technological engagement. By building on existing success stories – such as e-Devlet, TEKNOFEST, and SME-focused digital literacy programmes<sup>33</sup> – Türkiye can scale up what already works and use these platforms as laboratories for new initiatives while the EU could benefit from the knowledge and experience generated through these processes. The EU and Türkiye further could deepen cooperation in innovation ecosystems by promoting joint initiatives, knowledge exchange, and cross-border participation in technology-driven events.

In addition, Türkiye has developed effective public-private partnership models such as the TOBB Women Entrepreneurs Council<sup>34</sup> aimed at supporting women's digital inclusion. In this area, the EU and Türkiye could strengthen collaboration on gender-responsive digital policies, scale up inclusive digital skills programmes, and support joint initiatives that enhance women's participation in the digital economy.

Both the EU and Türkiye could increase initiatives targeting in early childhood education and STEM, expanding lifelong learning and reskilling initiatives, and strengthening the science-to-industry pipeline would support the country's goal of moving from strong digital use to stronger digital production.

On the regulatory and governance side, the evolution of the EU's digital *acquis* offers a reference, not as a one-size-fits-all template, but as a toolbox. The EU offers a mature regulatory framework, long-standing experience in multi-stakeholder governance, and access to programmes, funding instruments, and networks that can support Türkiye's own ambitions. A gradual convergence towards higher standards in data protection and AI governance, inspired by the GDPR and the AI Act while adapted to national priorities, would facilitate cross-border data flows, strengthen trust for investors and users, and enable deeper participation in the European digital single market. Developing inclusive, multi-stakeholder governance structures – bringing together public authorities, civil society, academia and the private sector – can help ensure that these regulatory choices are both context-sensitive and broadly supported. Meaningful stakeholder participation throughout the policy-making process can strengthen trust, improve implementation and contribute to more effective and resilient digital governance frameworks."

Both the EU and Türkiye strategies explicitly identify private businesses and SMEs as key drivers of economy-wide digital transformation, while also recognizing their vulnerability to adoption barriers. Enhancing the inclusion of private businesses and SMEs within cooperative frameworks could strengthen regional technological capacity and competitiveness, particularly in a global market dominated by major technology companies located outside Europe. If Türkiye chooses to introduce a GDPR-like framework, the potentially high compliance costs for SMEs should be taken into consideration. In this context, the EU ongoing efforts to simplify regulatory rules for

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<sup>33</sup>TÜBİSAD, Kobilere İin Dijital Okuryazarlık. (Digital Literacy for SMEs). [https://www.tubisad.org.tr/tr/images/pdf/kobiler\\_icin\\_dijital\\_okur\\_yazarlik\\_low.pdf](https://www.tubisad.org.tr/tr/images/pdf/kobiler_icin_dijital_okur_yazarlik_low.pdf)

<sup>34</sup> <https://www.tobb.org.tr/TOBBKadinGirisimcilerKurululu/Sayfalar/AnaSayfa.php>

SMEs<sup>35</sup> could serve as a useful model for easing implementation, reducing administrative burdens, and supporting smoother adaptation processes for businesses.

In the context of both the GDPR and the AI Act, the involvement of civil society organisations in the legislative process is of paramount importance. Indeed, the adoption of these legal instruments, and indeed more extensive digital policy-making in general, should be informed by the perspectives and input of these entities. Meaningful stakeholder consultation can strengthen the legitimacy, effectiveness and public acceptance of digital policies.

For EU-Türkiye dialogue, the moment is favourable to move from general declarations to operational partnerships. Priority areas could include: joint work on data governance and cybersecurity frameworks; structured exchanges on AI risk management and standards; twinning and peer-learning projects on digital public services; and the involvement of Türkiye in EU programmes on skills, research and innovation, wherever possible. Special attention should be devoted to SMEs, start-ups and scale-ups, supporting them with better access to finance, simplified procedures and targeted advisory services so that they can fully benefit from digitalisation and participate in European value chains. For the purpose of strengthening operational cooperation in both economic and social terms, one potential step would be to extend the EU roaming framework, in force within the EU since 2017, to Türkiye. Given Türkiye's strong ICT infrastructure, such integration would be technically feasible and could facilitate more accessible and cost-effective communication for Turkish private businesses and individuals while travelling within the EU.

In this spirit, the EESC-Türkiye JCC can act as a bridge-builder. By convening the social partners, business organisations, NGOs, civil society, and experts from both sides, it can identify practical projects, monitor progress and keep digital transformation high on the agenda of EU-Türkiye relations. The objective is not merely to align policies on paper, but to create shared capacities, shared standards and shared opportunities. Digital transformation can deliver its full potential only when technological innovation is accompanied by trust, participation and inclusive governance. A more integrated digital space between the EU and Türkiye would not only enhance competitiveness and innovation, but also contribute to social cohesion, quality employment and democratic resilience on both sides.

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<sup>35</sup> COM(2025) 501 final

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