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**SUSPENDED RIGHT  
TO PRIVACY**

**ENTRANCE GATE TO THE  
UNLAWFULNESS OF  
THE STATE OF  
EMERGENCY PERIOD**

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**SOLIDARITY WITH OTHERS  
BELGIUM**

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## INTRODUCTION

The purpose of this report, published by **Solidarity with Others**, is to examine how the right to privacy and freedom of communication, which were suspended by the Erdoğan regime as a first step in the unlawful policies amounting to social genocide against members of the Gülen Movement after the 15 July 2016 coup attempt, have been violated beyond measure in Türkiye.

The Gülen movement is a social movement of volunteers initiated by the Turkish Islamic scholar Fethullah Gülen, which promotes philanthropy, education and dialogue, acting around values and ideas such as serving society and humanity, seeking one's own happiness in the happiness of others, and spreading mutual empathy and respect through dialogue.

The Gülen movement has become a victim of the repressive and unlawful policies of the authoritarian Erdoğan regime, which has been in power in Turkey for the last 22 years. After the bribery and corruption operations against some ministers on 17/25 December 2013, the Erdoğan regime, which moved away from democratic values and shifted towards an authoritarian ground, considered the Gülen movement as a threat.<sup>1</sup> The regime dismissed some public officials it perceived to be affiliated with the movement from their jobs, and at the same time began to organise hate campaigns against the movement within the society.<sup>2</sup> In 2016, the Gülen movement was declared a terrorist organisation by the Turkish government.<sup>3</sup> Subsequently, Erdoğan blamed the Gülen movement for the coup attempt on 15 July 2016.<sup>4</sup> In the aftermath of the coup attempt, Erdoğan declared a state of emergency in the country in order to strengthen his authoritarian regime and suppress his opponents, using emergency decrees as an arbitrary tool in pursuit of his political interests.<sup>5</sup> During the state of emergency and in the following years, the Erdoğan regime took judicial action against approximately 693,162 people, detained 342,136 people suspected of belonging to the Gülen movement, arrested 102,579 people, convicted 122,632 people;<sup>6</sup> dismissed at least 125,678 public officials; closed down 35 health institutions, 1043 private education institutions, 1229 foundations and associations, 19 trade unions and 15 foundation higher education institutions; and publicly labelled approximately 2 million people as terrorists.<sup>7</sup>

Apart from Erdoğan, no state or international organisation has accepted the allegations that the coup attempt was planned by the Gülen Movement and that the Movement is a terrorist organisation. The United Nations and the European Union<sup>8</sup> have not accepted the allegation that the Gülen movement is engaged in terrorist activities. Moreover, the UN has condemned the arbitrary and unlawful treatment of the Gülen movement by the Turkish government during the state of emergency and resolved to stop it immediately.<sup>9</sup>

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<sup>1</sup> Describing the corruption operations as a coup against him, Erdoğan started to insult and slander the Gülen movement. [See](#) media news

<sup>2</sup> [See](#) media news

<sup>3</sup> [See](#) media news

<sup>4</sup> [See](#) media news

<sup>5</sup> [See](#) media news

<sup>6</sup> For the statements of Minister of Justice Yılmaz Tunç [See](#).

<sup>7</sup> [See](#) media news

<sup>8</sup> [See](#) media news

<sup>9</sup> UN [report](#) on the impact of the state of emergency on human rights in Turkey; [Views](#) adopted by the Working Group on Arbitrary Detention at its 98th session.

In response to the Erdoğan regime's arbitrary sentencing of members of the Gülen movement, the European Court of Human Rights ruled in *Yüksel Yalçinkaya v. Türkiye* that there had been a violation of rights.<sup>10</sup> In its judgment announced on 26 September 2023, the Grand Chamber stated that Turkey had violated the fundamental rights to a fair trial (Art. 6), no punishment without law (Art. 7) and freedom of assembly and association (Art. 11) of the European Convention on Human Rights in relation to the trial of Yüksel Yalçinkaya, who was convicted of membership of an armed terrorist organisation for allegedly being a member of the Gülen Movement. The charges of 'using the ByLock messaging application', 'having an account at Bank Asya' and 'being a member of certain trade unions and associations', which the Turkish Courts used as evidence for Yalçinkaya's conviction, were not accepted by the ECtHR as sufficient evidence for membership of a terrorist organisation.<sup>11</sup> Moreover, the Court said that the domestic courts had interpreted national terrorism laws so broadly as to violate fundamental rights and that the evidence used to establish membership of a terrorist organisation was unlawfully obtained.<sup>12</sup>

The ECtHR issued a press release after the judgement, stating that the points evaluated in the judgement concern approximately 8,500 cases pending before the Court and that the number of applications to the Court on the same issue will increase significantly in the coming years, considering that there are 100,000 ByLock users in Turkey.<sup>13</sup> Emphasising that the situation in Turkey is a systemic problem, the Court asked Turkey to find a solution to this systemic problem.<sup>14</sup> However, the judgement has not yet been implemented in domestic law and Turkey has not taken any steps to solve the systemic problem mentioned by the ECtHR. Moreover, the ECtHR requested Turkey's defence for 1000 applications on the same issue.<sup>15</sup>

As the first step of the Erdoğan regime, which has deviated from democracy and the rule of law, to violate the right to privacy as the first step of these unlawful acts against the volunteers of the Gülen movement for the last 10 years, which have caused an international reaction. The right to privacy, which is one of the foremost human rights today, has been suspended by the arbitrary pooling of personal data belonging to all citizens by law enforcement forces, especially for determining who is a volunteer of this Movement, and by making all the information of citizens easily accessible without a judicial process.<sup>16</sup> Thousands of people have been accused of terrorist organisation membership through profiling based on data illegally obtained by law enforcement agencies, from electronic communication content to trade union membership, from bank account information to intelligence reports on family members.

In this report, how the right to privacy, one of the fundamental human rights protected by international conventions and on constitutional grounds, has been suspended by the Erdoğan regime in recent years will be explained in the following chapters. In the first part, information will be given about the international conventions to which Turkey is a party and how fundamental rights are restricted during the state of emergency. In the second part, violations of the right to

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<sup>10</sup> [Yüksel Yalçinkaya v Türkiye](#), 26 September 2023, ECtHR

<sup>11</sup> Yalçinkaya Judgement, para. 272, 356, 402

<sup>12</sup> Ibid.

<sup>13</sup> For the ECHR press release [See](#)

<sup>14</sup> Ibid.

<sup>15</sup> For the ECHR press release in [December](#), in [April](#).

<sup>16</sup> [See](#) media news

privacy will be detailed under five headings. In the conclusion section, recommendations will be presented to overcome the problems experienced.

## PART ONE

### The Legal Framework on the Right to Privacy in Turkey

Turkey is a party to the United Nations Covenant on Civil and Political Rights and is bound by the protection of the right to privacy set out in Article 17. Turkey is also a party to the European Convention on Human Rights and is bound by the protection of the right to respect for private and family life set out in Article 8. As a member of the Council of Europe, Turkey is also a party to 'Convention No. 108 on the Protection of Individuals with regard to Automatic Processing of Personal Data'.

In domestic law, the right to privacy and freedom of communication are guaranteed at the constitutional level. In addition, the Turkish Criminal Code criminalises the violation of the right to privacy and the right to freedom of communication.

Turkey has a Personal Data Protection Law, which entered into force in 2016 and was inspired by the European General Data Protection Regulation. This code lays down rules on the processing of personal data.

### Post-2016 State of Emergency and Suspension of Fundamental Rights

Following the 15 July 2016 coup attempt, a State of Emergency was declared throughout the country for three months as of 21 July 2016. After the first three months, the State of Emergency was extended seven times and ended on 18 July 2018. During this period, the Council of Ministers issued 32 decrees with the force of law restricting fundamental rights and freedoms. Despite the lifting of the State of Emergency, these decrees were turned into laws to be implemented under normal conditions after 2018.

During the state of emergency (2016-2018), 135,147 public officials were dismissed and 22,474 teachers working in closed private institutions lost their work permits.<sup>17</sup> In addition, a total of 4,395 judges and prosecutors were dismissed by decisions of various boards, including the High Council of Judges and Prosecutors (HSK).<sup>18</sup> During the state of emergency, 15 private universities, 2 281 educational institutions and 201 media outlets were also closed, affecting thousands of employees and raising significant concerns about rights and fair trials. A total of 985 companies were seized by the state and new trustees were appointed. These companies employed a total of 49,587 workers.<sup>19</sup>

With the introduction of the state of emergency, Turkey suspended its national and international obligations as comprehensively as possible. In this context, the United Nations was informed that a total of 13 articles of the International Covenant on Civil and Political Rights would be restricted. Among these articles was the right to privacy (Article 17). Turkey also submitted a derogation declaration under Article 15 of the European Convention on Human Rights (ECHR). However, in its *Yalçınkaya judgement*, the ECtHR said that the notification by Turkey was not directed at

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<sup>17</sup> See media news

<sup>18</sup> For the statements of Minister of Justice Yılmaz Tunç See.

<sup>19</sup> See NGO statements

certain pre-determined rights but was a general notification which meant that all rights were suspended and went on to examine the application in hand.<sup>20</sup>

Following the state of emergency, systematic and widespread violations of fundamental rights were observed, particularly under the guise of administrative measures. The scale of these violations was so alarming that in 2018, the United Nations Human Rights Office published a report warning the Turkish government about the human rights violations that Turkey had committed during the state of emergency.<sup>21</sup> Administrative measures that suspended and disproportionately interfered with rights during the state of emergency remained in force after the state of emergency through laws enacted by the government. A de facto situation of arbitrary and disproportionate restriction of fundamental rights has emerged in Turkey recently.<sup>22</sup>

## PART TWO

### Unlawful acts against the Gülen Movement through violation of the right to privacy

#### 1)ByLock

Bylock messaging app, like Whatsapp, Telegram, Signal, etc., is ‘a mobile phone app that allows anonymous users to send encrypted messages over the Internet’. It was downloaded approximately 600,000 times in the App Store and Google Play Store between 2014 and 2016. **The fact that this application, which is available to everyone on online platforms, was downloaded on a mobile phone was considered by Turkish courts as sufficient evidence for ‘membership of an armed terrorist organisation’** and thousands of people in Turkey were sentenced to prison for this reason. In its **Yalçinkaya Judgment** in 2023, the ECtHR said that Turkey had obtained ByLock user records illegally,<sup>23</sup> that there was a suspicion that the user lists had been altered by law enforcement officers,<sup>24</sup> and that the mere use of a public messaging application could not be sufficient evidence for membership of an armed terrorist organisation<sup>25</sup>.

There is no concrete and clear information on how the data on ByLock usage was obtained.<sup>26</sup> Turkey's ‘National Intelligence Organisation’ report states that ‘...it was obtained by using technical intelligence methods, tools and techniques specific to the organisation’.<sup>27</sup> In the decisions of the Court of Cassation and the Courts of First Instance, it is stated that ‘By using technical intelligence methods, tools and techniques specific to the National Intelligence Organisation, the ByLock application and the data on the server of the application and different data, especially the content of e-mail addresses, were obtained by purchasing IP addresses’.<sup>28</sup>

Despite the fact that there is a regulation in the Code of Criminal Procedure on the procedure for searching and obtaining evidence through computer systems, data on the use of ByLock was obtained without complying with this procedure and was recognised as evidence in the courts.<sup>29</sup>

<sup>20</sup> Yalçinkaya Judgment, para. 213

<sup>21</sup> See OHCHR report

<sup>22</sup> See media news

<sup>23</sup> Yalçinkaya Judgment, para. 317

<sup>24</sup> Ibid.

<sup>25</sup> Yalçinkaya Judgment, para. 344

<sup>26</sup> See NGO statements

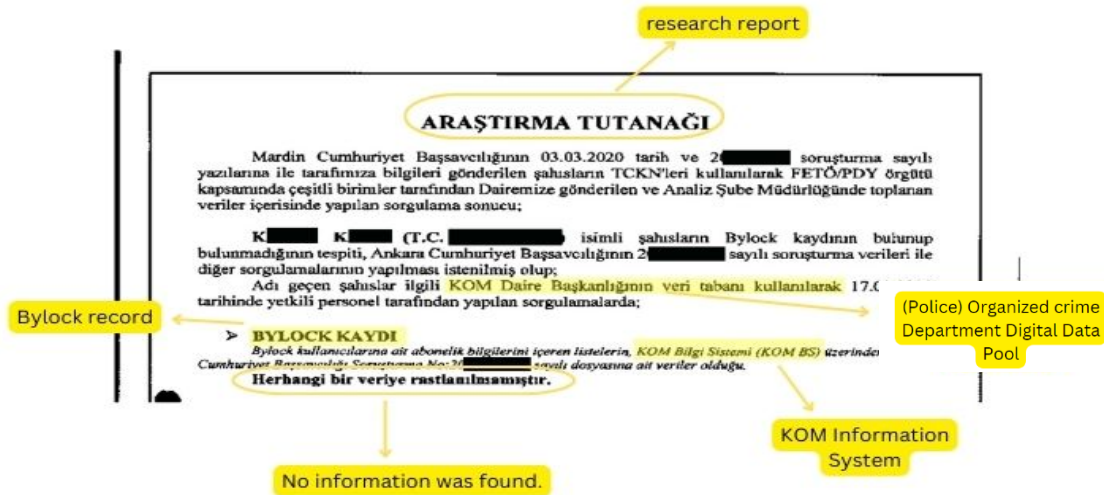
<sup>27</sup> MIT report, 3.1. Basis and Method, p. 12

<sup>28</sup> See Supreme Court decision

<sup>29</sup> Yalçinkaya Judgment, para. 317

While a computer system cannot be copied without a judge's order, National Intelligence Organisation (MİT) extracted many data including IP addresses and message contents from servers in Lithuania and gave them to the prosecutor's office.<sup>30</sup> In its **Yalçinkaya Judgement**, the ECtHR said that the ByLock usage data was obtained unlawfully without following the procedure prescribed in the Code of Criminal Procedure.<sup>31</sup> As a result, the Turkish authorities violated the principle that the right to privacy and the right to protection of personal data should only be restricted by the competent authorities in the investigation and prosecution stages only by legal means. The right to privacy of individuals was directly, arbitrarily and disproportionately suspended.

There are strong suspicions that the integrity of the ByLock user lists has been altered. In its **Yalçinkaya judgement**, the Court stated that the users' data had been kept by MİT for a period of time and that there were suspicions that the data may have been altered during this period.<sup>32</sup> At the same time, according to national media reports, the names of some ministers, MPs and senior party executives who were alleged to be ByLock users were removed from the user lists, thus avoiding charges of membership of a terrorist organisation.<sup>33</sup> The fact that ByLock user data, which is used as evidence in criminal proceedings for the accusation of membership of a terrorist organisation, can be accessed and modified by law enforcement officers is, on the one hand, contrary to the principle of keeping personal data accurate and, on the other hand, constitutes a serious interference with the right to privacy.



*This document is the investigative report requested by the Prosecution from the Police. The document shows the results of an inquiry made through an unlawful database created by the Department of Organised Crime of the National Police.*

<sup>30</sup> See media news

<sup>31</sup> Yalçinkaya Judgement, para. 317

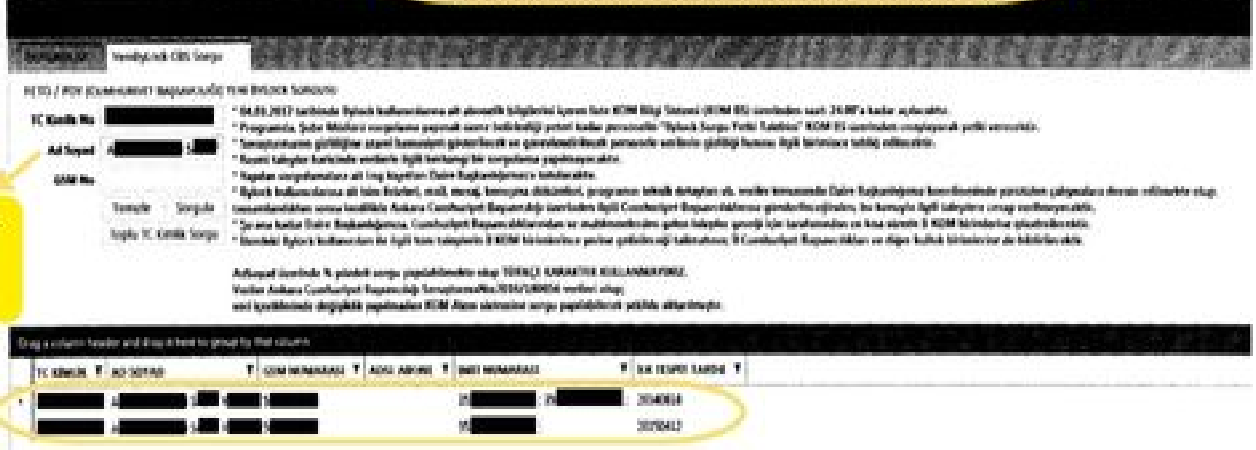
<sup>32</sup> Ibid.

<sup>33</sup> See media news

ByLock inquiry screenshot

**BYLOCK SORGULAMA SONUCU EKRAN GÖRÜNTÜSÜ**

ID Number and Name.



ByLock record

*This document is a screenshot of the result of an inquiry from an unlawful database created by the Department of Organised Crime of the National Police.*

Thousands of people were mistakenly included in ByLock user lists due to the fact that ByLock user lists were created based on IP records taken from servers and these IPs did not show real users.<sup>34</sup> It was determined in the Police report that 11 thousand people were included in the ByLock lists due to the uncertainty caused by CGNAT technology. CGNAT is a technology that works like the identity of every user on the internet. It provides IP addresses for each device, computers, smartphones, tablets, TVs, internet-connected sensors, security cameras, etc. However, when IPv4 ran out of addresses, a new protocol such as IPv6 was developed. However, switching to IPv6 is costly and operators often prefer more economical solutions such as CGNAT. CGNAT restricts access to the Internet with virtual IPs and requires real IP addresses. For operators using CGNAT, it is difficult to determine which user is using their real IP. In countries such as Turkey, it is reportedly difficult to identify real users due to the widespread use of CGNAT. Therefore, the claim that users of applications such as ByLock in Turkey can be identified through IP addresses is unrealistic.<sup>35</sup>

Internet traffic records, which according to domestic law must be kept for a maximum of 12 months, were obtained by the Turkish authorities after the maximum retention period and used

<sup>34</sup> See [news 1](#), [news 2](#),  
<sup>35</sup> [Fox-it Report](#)



in the proceedings.<sup>36</sup> These data were collected by the Information and Communication Technologies Authority (BTK) and transmitted to the judicial authorities, while they were kept by access providers. In the **Yalçinkaya case**, the Turkish government argued that the responsibility for retaining this data beyond the maximum period lay with the access providers.<sup>37</sup> However, such a defence cannot legitimise the collection and use of unlawfully retained data by state authorities in proceedings. Thus, the Turkish authorities also failed to comply with domestic rules on the protection of personal data, committing yet another violation that caused serious damage.

In 2023, the ECtHR, in its **Yalçinkaya Judgement**, declared that ByLock user data had been obtained unlawfully, that the data did not reflect actual users and that there were suspicions that user lists had been altered. On the grounds that the ByLock data was intended to be used as evidence in criminal proceedings, the Court examined the right to a fair trial under Article 6, which is overarching in the concrete case, rather than the right to privacy under Article 8.<sup>38</sup> However, the Court found that, in any event, there were acts that would violate the right to privacy.

As a result, the Erdoğan regime used the state of emergency for its political interests and punished hundreds of thousands of people as members of terrorist organisations based on evidence obtained by illegally restricting the right to privacy of individuals.<sup>39</sup> Despite the **Yalçinkaya judgement**, arrests and trials continue unabated.<sup>40</sup>

## 2)Bank Asya

Bank Asya was established in 1996 as Turkey's sixth private financial institution with its headquarters in Istanbul. As of 2011, in addition to its headquarters, Bank Asya had 182 branches, 2 domestic and 1300 foreign correspondent banks.<sup>41</sup> In 2013, following the bribery and corruption operations against some ministers, Bank Asya was seized due to the crackdown against the Gülen movement, which had become a target of the Erdoğan regime. In this context, it was first decided in 2015 that 63 per cent of the privileged shares determining the board of directors of Bank Asya would be used by the Savings Deposit Insurance Fund (TMSF).<sup>42</sup> Thus, the Banking Regulation and Supervision Agency was authorised to supervise the controlling shares of Bank Asya. With the decision published in the Official Gazette in the same year, Bank Asya was completely transferred to the SDIF.<sup>43</sup> Following the decision published in the Official Gazette dated 23 July 2016, Bank Asya's operating licence was cancelled.<sup>44</sup> In 2022, a confiscation decision was issued about the bank, and it was transferred to the treasury.<sup>45</sup>

What is noteworthy in the context of the right to privacy is the public collection of the transactions and records of all customers of the Bank Asya during the period when it was operating legally. The criterion of being a partner, employee and customer of Bank Asya was accepted as an important factor in the accusation of membership of the Gülen movement, which was declared a terrorist

<sup>36</sup> Law No. 5651 [article 6](#)

<sup>37</sup> Yalçinkaya Judgement, para. 369

<sup>38</sup> Yalçinkaya Judgement, para. 373

<sup>39</sup> The ECHR expects at least 100,000 more people who have been declared terrorists because they are on the Bylock user list to apply. [See.](#)

<sup>40</sup> [See](#) NGO report

<sup>41</sup> [See](#) information about Bank Asya

<sup>42</sup> [See](#) media news

<sup>43</sup> [See](#) media news

<sup>44</sup> [See](#) media news

<sup>45</sup> [See](#) media news

organisation by the Erdoğan regime during the state of emergency. According to the judicial authorities, a person with an account at Bank Asya can be considered a member of a terrorist organisation.<sup>46</sup> In order to determine terrorist organisation membership, all customer records and transaction histories of the seized Bank Asya were transferred to the administrative authorities without any criteria. This situation constitutes a violation of the right to privacy in terms of both the illegal procedure, the destination of the information and the disproportionate use of the entire data.

**ARAŞTIRMA TUTANAĞI**

Mardin Cumhuriyet Başsavcılığının 03.03.2020 tarih ve 2 [redacted] soruşturma sayılı yazılarına ile tarafımıza bilgileri gönderilen şahısların TCKN'leri kullanılarak FETÖ/PDY örgütü kapsamında çeşitli birimler tarafından Dairemize gönderilen ve Analiz Şube Müdürlüğünde toplanan veriler içerisinde yapılan sorgulama sonucu;

K [redacted] K [redacted] (T.C. [redacted]) isimli şahısların Bylock kaydının bulunup bulunmadığının tespiti, Ankara Cumhuriyet Başsavcılığının 2 [redacted] sayılı soruşturma verileri ile diğer sorgulamalarının yapılması istenilmiş olup;

Adı geçen şahıslar ilgili KOM Daire Başkanlığının veri tabanı kullanılarak 17 tarihinde yetkili personel tarafından yapılan sorgulamalarda;

**> BANK ASYA**

Başlığı altında yer alan bilgilerin, Ankara Cumhuriyet Başsavcılığının 2014/37666 sayılı FETÖ/PDY soruşturması kapsamında incelenen 15.01.2014 tarihinde ulusal medyada yayınlanan Fetullah GÜLEN'e ait [redacted] tarihli bir telefon konuşmasında, Fetullah GÜLEN'le konuşan kişinin bankanın likidite durumuna ilişkin bilgi vererek, örgüt içerisindeki kişiler ile bu kişilerin çevrelerinin bankaya yönlendirilmesi noktasında Fetullah GÜLEN'den onay aldığı ve akabinde bahse konu görüşmenin medyaya GÜLEN'den "Bank Asya'ya para yatırın" talimatı olarak yansıdığı bilgileri üzerine temin edilen Bank Asya Hesabında 31.12.2013 ile 24.12.2014 tarihleri arasında "para artışı olan/yeni hesap açan şahısların" listesi olduğu,

Bank Asya kayıtları 31.12.2013 ile 24.12.2014 tarih aralığı ile sınırlı olduğundan dolayı, daha fazla ve ayrıntılı hesap bilgilerinin TMSF veya Asya Katılım Bankası A.Ş.'den talep edilmesi gerektiği,

**Herhangi bir veriye rastlanılmamıştır.**

No information was found.

*This document is the investigative report requested by the Prosecution from the Police. The document shows the results of an inquiry made through an unlawful database created by the Department of Organised Crime of the National Police.*

The restriction on the right to privacy was exercised by administrative decree during the state of emergency. The provision of the banking law on confidentiality was suspended by emergency decree.<sup>47</sup> Erdoğan regime, which arbitrarily uses the state of emergency for its political interests, has opened the financial information of all citizens to administrative authorities without judicial review by bringing a restriction to the Banking Regulation. Moreover, in order to investigate the criterion of 'having an account in Bank Asya', which is used to determine membership in a terrorist organisation, instead of the judicial authorities making a determination in accordance with the

<sup>46</sup> See media news

<sup>47</sup> Emergency Decree 670, Article 3(2) See.

criminal procedure law, the database prepared by police forces was directly consulted during the investigation phase before the start of the trial. Thus, both domestic laws and the constitution and international treaties regulating the principle of legality in the limitation of fundamental rights were violated. In its **Yalçinkaya judgment**, the ECtHR ruled that the fact that ‘having an account in Bank Asya’ was used as a justification for ‘membership of an armed terrorist organisation’ violated the ECHR’s fundamental principles of ‘fair trial’ and ‘no crime and punishment without law’.<sup>48</sup>

The financial information of citizens was made constantly accessible to law enforcement agencies. While personal data can be processed by the competent authorities during the investigation and prosecution phase, this processing should be limited to the case by the relevant institution under judicial supervision. However, the customer data kept at Bank Asya was transferred to the database of police forces as a whole. A database was created to which not only the relevant institution but also all law enforcement agencies had access. From this database, it was made possible to query the account transactions of all customers.

**1- A █ G █**

**Şüpheli A █ G █ Hakkında KOMK Daire Başkanlığının yaptığı Tespitler:**  
1-KOM Daire Başkanlığımız dijital veri havuzunda şüpheli ve 1. derece yakınlarının “Bylock Kullananlar Liste” sorgu sonucu;

Şüpheli	Yakınlığı	GSM-ADSL	IMEI	(Police) Organisational crime Department Digital Data Pool
A █ G █	M █ G █ (Kardeşi) TCKN: █	5 █ 35	35 █ 0 █ 35 █ 4	20140811

Bank Asya records of his Brother.

**2-KOM Daire Başkanlığımız dijital veri havuzunda “Bank Asya Hesap Bilgileri ve Hareketleri” sorgu sonucu;**

Şüpheli	Yakınlığı	31-12-2013 Bakıye	24-12-2014 Bakıye	Bakıye Farkı	Hesap Açılış Tarihi
A █ G █	M █ G █ (Kardeşi) TCKN: █ (Hesap No:243930)	116.217,13	225.383,15	109.166,02	30.07.2002

Bank Asya records

**3-TMSF’den alınan 24.02.2017 tarih ve 49961860-203.02-E.5301 sayılı yazı ekinde bulunan dijital verilerin incelemesi sonucu Bank Asya’da Hesap bilgileri ve 2013 Aralık-2014 Aralık ile 2015 Mart-2016 Temmuz tarihleri arasındaki hesap değişiklikleri;**

Şüpheli	Yakınlığı	Hesap Açılış Tarihi	Yatan	Çekilen	Bakıye Farkı	Yıl
A █ G █	L █ G █ (Eşi) TCKN: █ (Hesap No:30442-Ortak Hesap)	20.01.1998	0,00	0,00	0,00	2013 Aralık 2014 Aralık
A █ G █	L █ G █ (Eşi) TCKN: █ (Hesap No:30442-	20.01.1998	0,00	0,00	0,00	2015 Mart 2016 Temmuz

Bank Asya record of his spouse

*This document is the investigation report requested by the Prosecutor’s Office from the National Police. The document presents the results of an investigation conducted through an illegal database created by the Organised Crime Department of the National Police. The document shows that the bank records of a suspect’s relatives were also in the police database. This indicates that the number of people in the police database is over millions.*

<sup>48</sup> Yalçinkaya Judgment, para. 262

The data obtained from Bank Asya were not individual inquiries to identify those who had accounts in the bank with a judicial decision, but all data were transferred to unauthorised institutions at once. The data of at least 1 million 600 thousand people, including public officials and their first-degree relatives, who had accounts at Bank Asya were transferred to law enforcement units and analysed.<sup>49</sup> It is not known how many people's account information was transferred to the digital data pool created by the law enforcement agencies. Moreover, the information held in the database by law enforcement agencies includes the financial information of thousands of people who are not affiliated with the Gülen movement. This situation contravenes the principle of proportionality in the restriction of fundamental rights. On the one hand, having an account in Bank Asya as evidence of membership in a terrorist organisation is a violation of the right to a fair trial, while on the other hand, the transfer of account information to the database of unauthorised law enforcement officers as a whole is a clear violation of the right to privacy and protection of personal data.

### 3) Records on personal and family status

After the 15 July coup attempt, judicial proceedings were taken against 693,162 people allegedly linked to the Gülen movement and 122,632 convictions were handed down.<sup>50</sup> The main evidence used as a basis for these detentions and arrests are databases that were created by unlawful methods and arbitrarily violate the privacy rights of individuals. These databases in the hands of law enforcement agencies contain lists prepared according to criteria that indicate whether a citizen is a member of the Gülen movement or not. In addition to the above-mentioned criteria such as having a Bank Asya account and using the Bylock messaging programme, these criteria also include the following :

- Being among the registered employees and members of associations, trade unions and organisations closed down by the Emergency Decree,
- Being on the list of subscribers to newspapers, magazines and periodicals closed down by the Emergency Decree,
- Being on the list of students enrolled in schools closed down by the Emergency Decree or having a child on these lists,
- Being on the list of people who donated to the aid organisation 'Kimse Yok mu', which was closed down by Emergency Decree,
- Being included in the list of persons dismissed from public office with the Emergency Decree or the lists attached to the Emergency Decree,
- Being on the lists of people who have been dismissed from their jobs by organisations such as the Council of Judges and Prosecutors and the Court of Accounts, (4360 people)<sup>51</sup>
- Being a person whose social security records show that he/she works in the companies of people known to be members of the Gülen movement,
- Being on the list of owners of the companies to which a trustee has been appointed,
- To be among the people who are understood to have stayed in the specified hotels on certain dates in the accommodation registration lists received from the hotels,

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<sup>49</sup> [Report](#) of the Turkish Grand National Assembly Coup Investigation Commission p. 431

<sup>50</sup> [See](#) media news

<sup>51</sup> [See](#) Turkey Tribunal post

- Being on the list of those whose passports have been annotated by the Ministry of Interior by administrative decision without a judicial decision,<sup>52</sup>
- Foreign entry-exit records (travelling to the USA),
- To be included in the phone call records of persons thought to be members of the Gülen movement,
- Being one of those whose data is found in the information obtained from digital and other materials seized in the investigation,<sup>53</sup>
- Being on the list of those who terminated their Digitürk subscription after Digitürk, Turkey's largest digital broadcasting platform, blocked access to broadcast channels affiliated with the Gülen movement,<sup>54</sup>
- Being on the list of people who send cargo to people associated with the Gülen movement,
- Finding fingerprints on books that were thrown away after the ban on books published by the Gülen movement,
- Being on the list of those who were subjected to judicial proceedings after 15 July,
- Being on the list of people from the intelligence services whose family members were identified as members of the Gülen movement.

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<sup>52</sup> [See](#) media news

<sup>53</sup> In total, at least 2,600,000,000 digital materials were [seized](#) from detainees throughout the entire period.

<sup>54</sup> While Digitürk was Turkey's largest broadcasting platform, in 2015, the board of directors decided to remove some channels affiliated with the Gülen movement from the platform. Upon this development, thousands of people cancelled their subscriptions. The Prosecutor's Office collected data from Digitürk on all citizens who cancelled their subscriptions in the specified period. [See](#) media news

Research Report

## ARAŞTIRMA TUTANAĞI

Mardin Cumhuriyet Başsavcılığının 03.03.2020 tarih ve 2019/2043 soruşturma sayılı yazılarına ile tarafımıza bilgileri gönderilen şahısların TCKN'leri kullanılarak FETÖ/PDY örgütü kapsamında çeşitli birimler tarafından Dairemize gönderilen ve Analiz Şube Müdürlüğünde toplanan veriler içerisinde yapılan sorgulama sonucu;

K. [REDACTED] K. [REDACTED] (T.C. [REDACTED]) isimli şahısların Bylock kaydının bulunup bulunmadığının tespiti, Ankara Cumhuriyet Başsavcılığının 20 [REDACTED] sayılı soruşturma verileri ile diğer sorgulamalarının yapılması istenilmiş olup;

Adı geçen şahıslar ilgili KOM Daire Başkanlığının veri tabanı kullanılarak 17.03.2020 tarihinde yetkili personel tarafından yapılan sorgulamalarda;

(Police) Organisational  
crime Department  
Database

Bylock record

### BYLOCK KAYDI

Bylock kullanıcılarına ait abonelik bilgilerini içeren listelerin, KOM Bilgi Sistemi (KOM BS) üzerinden sorgulanarak Ankara Cumhuriyet Başsavcılığı Soruşturma No:2016/180056 sayılı dosyasına ait veriler olduğu,

Herhangi bir veriye rastlanılmamıştır.

Crisis Center  
Data

### KRİZ MERKEZİ VERİSİ

Başlığı altında yer alan bilgilerin, Terörle Mücadele Daire Başkanlığı'nda kurulan kriz merkezinde 15 Temmuz Darbe Girişimi sonrasında adli işlem yapılan şahıslar içerisinde ismi bulunmaları gösterir liste olduğu,

Herhangi bir veriye rastlanılmamıştır.

Investigation  
Data

### SORUŞTIRMALAR

Başlığı altında yer alan bilgilerin, 29.09.2015 tarihinden itibaren KOM Daire Başkanlığı Analiz Şube Müdürlüğünde toplanan FETÖ/PDY örgütü kapsamında merkez ve taşra KOM birimlerinde yürütülen soruşturma verileri olduğu,

Herhangi bir veriye rastlanılmamıştır.

Bank Asya  
Record

### BANK ASYA

Başlığı altında yer alan bilgilerin, Ankara Cumhuriyet Başsavcılığının 2014/37666 sayılı FETÖ/PDY ana davası soruşturması kapsamında incelenen 15.01.2014 tarihinde sımsal medyada yayınlanan Fetullah GÜLEN'e ait 25.12.2013 tarihli bir telefon konuşmasında, Fetullah GÜLEN'le konuşan kişinin bankanın likidite durumuna ilişkin bilgi vererek, örgüt içerisindeki kişiler ile bu kişilerin çevrelerinin bankaya yönlendirilmesi noktasında Fetullah GÜLEN'den onay aldığı ve akabinde bahse konu görüşmenin medyaya Gülen'den "Bank Asya'ya para yatırım" talimatı olarak yansıdığı bilgileri üzerine temin edilen Bank Asya Hesabında 31.12.2013 ile 24.12.2014 tarihleri arasında "para artışı olan/yeni hesap açan şahısların" listesi olduğu,

Bank Asya kayıtları 31.12.2013 ile 24.12.2014 tarih aralığı ile sınırlı olduğundan dolayı, daha fazla ve ayrıntılı hesap bilgilerinin TMSF veya Asya Katılım Bankası A.Ş.'den talep edilmesi gerektiği,

Herhangi bir veriye rastlanılmamıştır.

Membership of  
certain Associations  
Data

### BELGE EVRAK/DERNEK

Başlığı altında yer alan bilgilerin, FETÖ/PDY kapsamında değerlendirilen KOM Daire Başkanlığına gönderilen belgeler ve çeşitli belge-evrak verileri olduğu,

TCKNO	ADI SOYADI	CINS	BELGE-EVRAK-DERNEK	BİLGİ KAYNAĞI	REF. TCKN	REF. YAKINLIĞI
[REDACTED]	K. [REDACTED] K. [REDACTED]	Beğge_Evrak	701 SAYILI KHK İLE İHRAÇ OLAN EGM PERSONELİ	KOM.DAİ.BSK. İNSAN KAYNAKLARI	[REDACTED]	Kendisi

Relationship with  
certain private  
companies

### ŞİRKETLERİ SORUŞTURMA

Başlığı altında yer alan bilgilerin, sorgulanan şahısların ortağı veya yöneticisi olduğu şirketin 29.09.2015 tarihinden itibaren KOM Daire Başkanlığına gönderilen ve Analiz Şube Müdürlüğünde toplanan FETÖ/PDY örgütü kapsamında merkez ve taşra KOM birimlerinde yürütülen soruşturma verilerinde bulunan şirketler olduğu,

Herhangi bir veriye rastlanılmamıştır.

Sayfa 1 / 2

This document is the investigation report requested by the Prosecutor's Office from the National Police. The document presents the results of an investigation conducted through an illegal database created by the Organised Crime Department of the National Police.

Companies having  
account at Bank  
Asya

Documents  
received from  
seized certain  
companies

Social security  
data

Data revealing if  
he/she was  
dismissed from  
public service

passport  
annotation records

relationship with  
anyone from the  
executives of the  
organization

➤ **ŞİRKETLERİ BANK ASYA**

Başlığı altında yer alan bilgilerin Ankara Cumhuriyet Başsavcılığının 2014/37666 sayılı FETÖ/PDY ana davası soruşturması kapsamında incelenen 15.01.2014 tarihinde ulusal medyada yayınlanan Fetullah GÜLEN'e ait 25.12.2013 tarihli bir telefon konuşmasında, Fetullah GÜLEN'e komşu kişinin bankanın likidite durumuna ilişkin bilgi vererek, örgüt içerisindeki kişiler ile bu kişilerin çevrelerinin bankaya yönlendirilmesi noktasında Fetullah GÜLEN'den onay aldığı ve akabinde bahse konu görüşmenin medyaya Gülen'den "Bank Asya'ya para yatırım" talimatı olarak yansdığı bilgileri üzerine temin edilen Bank Asya Hesabında 31.12.2013 ile 24.12.2014 tarihleri arasında "para arışı olan/yeni hesap açan ŞİRKETLERİN YÖNETİCİ VEYA ORTAKLARI" listesi olduğu.

**Herhangi bir veriye rastlanılmamıştır.**

➤ **ŞİRKETLERİ BELGE EVRAK**

Başlığı altında yer alan bilgilerin, sorgulanan şahısların ortağı veya yöneticisi olduğu şirketlerden FETÖ/PDY kapsamında değerlendirilerek KOM Daire Başkanlığına gönderilen belge-evrak verilerinde geçen şirketlerin listesi olduğu,

**Herhangi bir veriye rastlanılmamıştır.**

➤ **ŞÜPHELİ ŞİRKETTE SGK KAYDI**

Başlığı altında yer alan bilgilerin, sorgulanan şahısların 29.09.2015 tarihinden itibaren KOM Daire Başkanlığına gönderilen ve Analiz Şube Müdürlüğünde toplanan FETÖ/PDY örgütü kapsamında merkez ve taşra KOM birimlerince yürütülen soruşturmalarda veya belge-evrak verilerinde geçen şirketlerde çalışmış şahıslara ait SGK kayıtları olduğu belirtilmiştir.

**Herhangi bir veriye rastlanılmamıştır.**

➤ **DPA İHRAÇ KAYITLARI**

Devlet Personel Başkanlığı KHK ile İhraç verilerini ve OHAL komisyonu tarafından görevine iade edilen şahıs verilerini içermektedir. Hükümsüzlük sütununda yer alan bilgiler OHAL komisyonu tarafından göreve iade edilen şahıslar veya diğer nedenlerden dolayı hükümsüzlük kararı alınmış verileri içermektedir. EGM Aktif-Pasif verisi ve DPB ihraç verisi günde 1 kez olmak üzere güncellenmektedir.

TCKN	ADI SOYADI	BİRİMİ	UNVANI	KURUM ADI	İHRAÇ BİLGİSİ	HİZMET SINIFI AÇIKLAMA	REF. TCKN	REF. YAKINLIĞI
■■■■■	K■■■■ K■■■■	GAZİANTEP	POLİS MEMURU	EMNİYET GENEL MÜDÜRLÜĞÜ	701 SAYILI KHK KAPSAMINDA RAMU GÖREVİNDEN ÇIKARILMA	EMNİYET HİZMETLERİ SINIFI	■■■■■	Kendisi

➤ **PASAPORT ŞERHİ KAYITLARI**

Farklı kurumlarda pasaportlarına; FETÖ/PDY kapsamında terör iltisakı/irtibatı bulunduğundan şerh kaydı girilen şahıslarla ilgili kayıtları içermektedir.

TCKN	ADI SOYADI	EVRAK NO	KAYIT YAPAN BİRİM	YAKINLIK	REF. TCKN	REFERANS YAKINLIĞI
■■■■■	K■■■■ K■■■■	2017-04-26    1643	GAZİANTEP - NÜFUS VE VATANDAŞLIK İŞLERİ GENEL MÜDÜRLÜĞÜ	KENDİSİ	■■■■■	Kendisi
■■■■■	K■■■■ K■■■■	2018-07-10    37373650-803-(63044)128946 *701 SAYILI KHK	NÜFUS VATANDAŞLIK İŞLERİ GENEL MÜDÜRLÜĞÜ - NÜFUS VE VATANDAŞLIK İŞLERİ GENEL MÜDÜRLÜĞÜ	KENDİSİ	■■■■■	Kendisi

➤ **TEPE YÖNETİMİ İLE İRTİBAT**

Başlığı altında yer alan bilgilerin, Ankara 2104/37666 sayılı FETÖ/PDY ana çatı soruşturması kapsamında HTS kaydı alınan 72 şahsa ait 336 numaranın irtibatlı olduğu karşı numaralarla karşılaştırmalar yapıldığı, HTS kaydı alınan 72 şahsa ait 336 numaranın irtibatlı olduğu karşı numaraların abone bilgilerinden T.C. numaraları tespit edilerek yapılan karşılaştırma sonucu oluşturulan veriler olduğu.

**Herhangi bir veriye rastlanılmamıştır.**

İş bu tutanak tarafımızdan tanzimle altı birlikte imza altına alınmıştır. 17.03.2020 Saat: 17:00

///  
311830  
KOM Şb. Md. Gör.

369267  
KOM Şb. Md. Gör.

Sayfa 2 / 2

This document is the investigation report requested by the Prosecutor's Office from the National Police. The document presents the results of an investigation conducted through an illegal database created by the Organised Crime Department of the National Police.

The above-mentioned lists were collected and pooled by police forces during the state of emergency. These pooled lists are among the sensitive information listed in Article 9 of the European General Data Protection Regulation and Article 6 of the Turkish Personal Data Protection Law, reflecting the working life, trade union membership, political, religious and philosophical views of individuals. Moreover, this information is not only limited to individuals' own lives, but also includes information on whether their family members and close relatives are members of the Gülen movement. A file is created by police forces on individuals who fulfil one or more of the criteria used as indicators of allegiance to the Gülen movement and referred to the investigation authorities. The investigating authorities then gather the evidence and file a public case for a sentence on the charge of membership of a terrorist organisation.

The arbitrary use of such a large database of citizens by police forces without a court order and without judicial oversight clearly shows that the interference with privacy rights is disproportionate.

#### **4) Wanted list for terrorism-related persons and list of individuals whose assets are frozen**

Arrest warrants have been issued for members of the Gülen movement who left Turkey and sought asylum in Western countries to avoid arbitrary arrests and detentions during the state of emergency. Moreover, a website was prepared by the Ministry of Interior for prominent figures in the Gülen movement in the media. On this website, the names and pictures of people who were thought to be members of a terrorist organisation were published with the phrase 'wanted for Fetö Terrorist Organisation' underneath them.<sup>55</sup> The same website includes the amount of reward to be given to those who capture and deliver the wanted persons. Asset freezing orders have been published in the Official Gazette against some members of the Gülen movement whom the Turkish authorities have unjustifiably declared to be members of a terrorist organisation.<sup>56</sup>

Without a court decision indicating that they are members of a terrorist organisation, the individuals whose names appear on the above-mentioned website have suffered serious victimisation in the countries they have visited. These individuals were recorded in databases as 'persons linked to terrorism' by organisations that collect data from open sources and conduct financial profiling. The profiles created by these organisations are shared with institutions that are obliged to comply with the regulations on combating money laundering and terrorism financing. Therefore, on the one hand, banks outside Turkey refuse to open accounts, grant loans, or provide money transfer services to these individuals, while on the other hand, this problem is encountered in car sales, online shopping, and even food orders. People of the Gülen movement who flee from the arbitrary arrest and detention decisions of the political power in Turkey are also victims of the arbitrary decisions of the Turkish government in the countries where they go and suffer financial grievances. The Turkish government is deliberately exploiting the mechanisms of combating the financing of terrorism and money laundering. The fact that Turkey ranks second after China in the world in the application of transnational repression against its citizens abroad is one of the most important indicators that the Turkish government can abuse international mechanisms in line with its political interests.<sup>57</sup>

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<sup>55</sup> [See](#) the web site

<sup>56</sup> [See](#) official page of MASAK(Financial Crimes Investigation Board)

<sup>57</sup> [See](#) Human Rights watch report



Large companies that have recently collected information from open sources to build financial profiles of individuals have been warned that the data held does not reflect the truth. Based on the principle of the European General Data Protection Regulation that the data held must be accurate, requests for rectification were sent to the organisations concerned. NGOs reported on these cases.<sup>58</sup> Some organisations refused to delete or correct the profiles, claiming that the data they received was from official Turkish sources. This has led to continued victimisation of individuals whose names are on Turkey's terrorist list.

In conclusion, the Turkish government's decision to publish people who have been found by the ECtHR not to be involved in terrorism on a website of the Ministry of Interior as wanted persons for terrorism and on the list of those whose assets have been frozen in the official gazette shows that the Turkish state has failed to fulfil its obligations on privacy rights.

## 5) Unlawful profiling of those affected by Emergency Decrees

After the 15 July coup attempt, the Turkish government suspended fundamental rights during the state of emergency and dismissed thousands of people from their jobs through administrative decisions. According to the State of Emergency Inquiry Commission's Annual Report published in January 2020, 131,922 'measures' were taken, at least 125,678 public officials were dismissed, 270 people were dismissed as students, and 3,213 personnel were stripped of their ranks.<sup>59</sup> According to the statements of the Minister of National Defence, 24,706 people, including 150 generals, were suspended from the Turkish army in 5 years, and 1,243 people were stripped of their ranks.<sup>60</sup>

The names mentioned in the lists attached to the administrative decisions were suspended from public duties. However, it was noteworthy that there were no criminal investigations and prosecutions against these people during the period they were suspended from public office. People who were not investigated as members of a terrorist organisation were listed and dismissed from their positions very soon after the 15 July coup attempt. Since it was impossible for the judicial authorities to investigate whether the officials concerned were affiliated with the Gülen movement in such a short period of time, it was understood that the lists attached to the administrative decisions were prepared before the coup attempt.

Especially the day after the coup attempt, detention orders were issued for 2,847 judges and prosecutors.<sup>61</sup> Since it is impossible to conduct an investigation in one day according to the criteria set out in the headings above to determine whether a person is affiliated with the Gülen movement, it was understood that information was collected, and profiling was carried out on these people in the institutions they worked in before the coup attempt.

The official documents revealed that this profiling was being carried out not only in Turkey but also in other countries. In the documents showing that the profiling made after the study conducted by the Ministry of Foreign Affairs was shared with the Turkish National Police and the necessary action was requested, it was revealed that intelligence information was collected on thousands of people and that these were collected in a database and used in judgements.

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<sup>58</sup> [See](#) NGO report

<sup>59</sup> [See](#) media news

<sup>60</sup> [See](#) media news

<sup>61</sup> [See](#) media news

T.C.  
İÇİŞLERİ BAKANLIĞI  
Emniyet Genel Müdürlüğü

General Directorate of  
Security(National Police)

Sayı : 62018024-87053.(63044)/  
Konu : 2018/43629 Soruşturma

05/07/2018

To the Prosecutor's Office

**Subject**

**ANKARA CUMHURİYET BAŞSAVCILIĞINA**  
**(Anayasal Düzene Karşı İşlenen Suçlar Soruşturma Bürosu)**

**Letter from Ministry of Foreign Affairs**

İlgi: a) 23/02/2018 tarih ve Soruşturma no:2018/43629 sayılı yazınız.  
b) Dışişleri Bakanlığının 19.02.2018 tarih ve GİGY/2018-13502069 sayılı yazısı.

İlgi (a) yazı ekinde gönderilen ilgi (b) yazı ekinde bulunan (2) adet CD içi **two CD disks sent from ministry were examined** şahıslar hakkında tasnif çalışmalarının yapılarak elde edilecek bilgi ve belgelerin gö- istenmiştir.

Dışişleri Bakanlığının göndermiş olduğu (2) adet CD incelendiğinde EK-1 CD içerisinde (226) satırdan oluşan kişi bilgilerinin yer aldığı, EK-2 CD içerisinde (4160) satırdan oluşan kişi bilgilerinin yer aldığı görülmüştür. CD' ler içeriğindeki bilgilerin tasnif çalışması yapıldığında;

TC kimlik numaralarının birçoğunun "TCKN" sütunundan farklı bir sütunda yer aldığı, Eksik, fazla veya hatalı TC kimlik numaralarının bulunduğu, 1 şah **Personal information cards concerning 2808 persons(living abroad) were completed.** numarası yazıldığı, bir TC kimlik numarasının birden fazla Scheuermann şeklinde kimlik tespiti imkansız isim bilgi bağlantısı veya irtibat-iltisak bilgisi belirtilmeden sadece ad soya **721 of them are still under investigation.** görülmüştür. Yapılan tasnif çalışması sonucu **2808 kişisi** şahsın kimlik tespiti yapılamamıştır.

Tasnif çalışması sonucu elde edilen veriler şahıs kartlarına işlenmiş, her şahıs için ayrı kişi kartı (2808 adet) tanzim edilmiştir. **721 şahsın halen devam eden soruşturması olduğu anlaşılmıştır. Kişi kartları; soruşturması olanlar, Türkiye'de adresi olanlar şeklinde ayrılarak (18 klasör) halinde EK-1'de sunulmuştur. Soruşturma kapsamında elde edilen tüm veriler CD içerisinde EK-2' de, CD içeriği dizi pusulası ise EK-3'de sunulmuştur.**

Arz ederim.

Volkan İMİŞÇİ  
Kaçakçılık ve Organize Suçlarla  
Mücadele Daire Başkanı a.  
Daire Başkan Yardımcısı  
2.Sınıf Emniyet Müdürü

**EKLER**

1-(2808) Kişi kartı (18 Klasör)  
2-Tüm veriyi içeren CD (1 Adet)(Hash: 65549D2a83d79dca8b221a8987a176fb. 866945a070d2cf3b14aa41d350737e8. de7e4350730c5614e90e897da9e7e1. 00ced27959c39efda76141dca4071fe94. e9caed17633dfa4cfad3b9e9865b0c421)  
3-CD içeriği dizi pusulası (1 sayfa)  
4-Tutanak (1 sayfa)

Yüceltepe Mah. Necatibey Cad. No:108 Çankaya ANKARA  
Telefon : (0 312) 412 72 88  
E-posta : kom.ulusalguvenlik@cgm.gov.tr

İrtibat : Ulusal Güvenliğe Yönelik Suçlarla Mücadele Şb. Md.  
Faks : (0 312) 412 06 21  
Elektronik Adres : www.kom.pol.tr

*This document is about the classification of information on approximately 3500 persons (Turkish citizens living abroad) on CD discs sent by the Ministry of Foreign Affairs to the National Police and the creation of profiles.*

Many personal data on individuals and their families who were the subject of such an intervention into their private lives, such as their family, property, residence, vehicle, workplace, etc. were deliberately collected and processed in databases by state institutions. Those who were considered to be affiliated with the Gülen movement were dismissed from their professions through administrative decisions during the state of emergency and were subjected to criminal proceedings. Moreover, these people and their families, whose privacy was violated, were labelled as terrorists by the society and were distanced from the society. People whose dismissal with the Decree Law was recorded in property registries even had difficulties in selling the real

estate registered to them.<sup>62</sup> People who were labelled as Emergency Decree victims in all state records were put under such pressure that they could not even carry out their daily routine activities.

## Conclusion and Recommendations

The Erdoğan regime, which suspended fundamental rights during the state of emergency, implemented arbitrary and oppressive measures in line with its political interests through administrative decisions and the politicised judiciary. The right to privacy was violated as the first step of all unlawful acts carried out by the state. In this context, the personal data of millions of people were used by unauthorised authorities in an unlawful and disproportionate manner.

The recommendations of Solidarity with others on the issues analysed in this report are as follows:

- 1) **Deletion of ByLock usage data from all databases** as soon as possible, in line with the ECtHR's decision in *Yalçınkaya*, which ruled that it cannot be used as evidence of membership of a terrorist organisation and called on Turkey to find a solution to this systemic problem
- 2) **Preventing the administrative authorities from accessing the financial data of at least 1 million 600 thousand people** who have accounts at Bank Asya and ensuring access only by court order
- 3) **Removal of names, photographs and other information about members of the Gülen movement from <https://www.terorarananlar.pol.tr/>**
- 4) **Removing the names of those affiliated with the Gülen Movement from the lists of those whose assets are frozen**
- 5) **Deletion of unlawful databases containing the information of millions of people** and kept permanently accessible by police forces
- 6) **Deletion the profiles of dismissed public officers and re-employing those who have not been convicted of a criminal offence**

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<sup>62</sup> See media news



OTHERS AISBL, BELGIUM

2024

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