

POINT OF VIEW - SEPTEMBER 2026

# Turkey: From Regulatory Obligation to Board-Ready Evidence.

Integrated banking controls and breach evidence for Turkey

Turkey combines detailed banking internal-systems requirements with information-systems regulation, capital-market governance and a mature personal-data protection regime. Banks and enterprises need a defensible connection between risk governance, internal audit, technology incidents and time-bound breach notification.

|                                       |                              |                                                                                                 |
|---------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------|
| <b>REGION</b><br>Middle East / Europe | <b>REGULATORY HUB</b><br>TUR | <br>Turkey |
|---------------------------------------|------------------------------|-------------------------------------------------------------------------------------------------|

Country in Brief

|                                             |                                                |                                                    |                                           |
|---------------------------------------------|------------------------------------------------|----------------------------------------------------|-------------------------------------------|
| <b>4</b><br>Regulatory authorities profiled | <b>5</b><br>Official regulatory sources mapped | <b>6</b><br>Supervisory priorities operationalised | <b>3</b><br>Connected TransVare platforms |
|---------------------------------------------|------------------------------------------------|----------------------------------------------------|-------------------------------------------|

## 01 Turkey Regulatory Landscape

Turkey combines detailed banking internal-systems requirements with information-systems regulation, capital-market governance and a mature personal-data protection regime. Banks and enterprises need a defensible connection between risk governance, internal audit, technology incidents and time-bound breach notification.



### **BRSA**

Banking Regulation and Supervision Agency

#### **Industries Regulated**

Banking and lending



### **CMB**

Capital Markets Board

#### **Industries Regulated**

Capital markets and listed companies



### **KVKK**

Personal Data Protection Authority

#### **Industries Regulated**

Cross-sector data controllers and processors



### **USOM**

National Cyber Incidents Response Center

#### **Industries Regulated**

Government and critical infrastructure

## 02 Supervisory Priorities

The applicable perimeter depends on entity type, licence and sector. These priorities provide a practical starting point for programme design and evidence management.

|           |                                                  |           |                                                 |
|-----------|--------------------------------------------------|-----------|-------------------------------------------------|
| <b>01</b> | <b>Bank risk management and internal systems</b> | <b>02</b> | <b>Independent internal audit and assurance</b> |
| <b>03</b> | <b>Information-systems governance</b>            | <b>04</b> | <b>Cyber incident and breach response</b>       |
| <b>05</b> | <b>Third-party continuity and resilience</b>     | <b>06</b> | <b>Board and capital-market reporting</b>       |

## 03 From Obligation to Board-Ready Evidence

Use one traceable workflow to translate requirements, manage execution and demonstrate oversight.

|                                                                                                                                  |                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| <b>01</b><br><b>Catalogue Obligations</b><br>Structure local requirements by entity, licence, authority and accountable owner.   | <b>02</b><br><b>Connect Operational Evidence</b><br>Link obligations to risks, controls, incidents, tests, findings and remediation. |
| <b>03</b><br><b>Monitor and Assure</b><br>Track KRIs, control status, audit coverage, incidents and action closure continuously. | <b>04</b><br><b>Report to Leadership</b><br>Turn current operational evidence into traceable executive and board oversight.          |

## 04

## Turkey Regulation and Product Map

Each official requirement below is translated into an operational GRC focus. Only platforms with a defensible workflow or evidence role are shown as a primary or supporting fit.

|                                                      |                                                                                                                           |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Banking Law No. 5411</b><br><b>BRSA</b>           |                                                                                                                           |
| <b>Applies To</b>                                    | Banks and other institutions within the Law's scope                                                                       |
| <b>Operational Focus</b>                             | Internal control, risk management, internal audit systems, consolidated oversight and governance responsibilities.        |
| <b>Audit<span>are</span><sup>®</sup> Primary Fit</b> | Audit universe, risk-based planning, RCM-linked testing, working papers, evidence, findings and follow-up.                |
| <b>ERM<span>are</span><sup>®</sup> Primary Fit</b>   | Risk and control registers, assessments, appetite or limits, KRIs, treatments, approvals and board reporting.             |
| <b>Scope Boundary</b>                                | Workflow and evidence support only. Applicability and legal interpretation remain with the organisation and its advisers. |
| <b>Official Source</b>                               | <b>Open Official Source</b>                                                                                               |

|                                                                                         |                                                                                                                                                 |
|-----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Regulation on Information Systems and Electronic Banking Services</b><br><b>BRSA</b> |                                                                                                                                                 |
| <b>Applies To</b>                                                                       | Banks operating in Turkey                                                                                                                       |
| <b>Operational Focus</b>                                                                | Information-systems governance, risk controls, continuity, third-party services, security events, monitoring and electronic-banking resilience. |
| <b>ERM<span>are</span><sup>®</sup> Primary Fit</b>                                      | Third-party risks, controls, assessments, treatments, approvals, KRIs and oversight reporting.                                                  |
| <b>Inci<span>are</span><sup>®</sup> Primary Fit</b>                                     | Cyber-event intake, escalation, investigation, root cause, corrective action, recovery tracking and audit trail.                                |
| <b>Scope Boundary</b>                                                                   | Workflow and evidence support only. Applicability and legal interpretation remain with the organisation and its advisers.                       |
| <b>Official Source</b>                                                                  | <b>Open Official Source</b>                                                                                                                     |

**Communique on Corporate Governance II-17.1****CMB**

|                                                                                                         |                                                                                                                               |
|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Applies To</b>                                                                                       | Publicly held companies within the Communique's applicable scope                                                              |
| <b>Operational Focus</b>                                                                                | Board and committee governance, internal control and audit oversight, risk management, disclosure and accountable follow-up.  |
|  <b>Primary Fit</b>    | Risk and control registers, assessments, appetite or limits, KRIs, treatments, approvals and board reporting.                 |
|  <b>Supporting Fit</b> | Risk-based assurance, control design and effectiveness testing, evidence, findings and action follow-up.                      |
| <b>Scope Boundary</b>                                                                                   | Notification workflow and evidence can be configured. Submission to an authority requires an approved process or integration. |
| <b>Official Source</b>                                                                                  | <b>Open Official Source</b>                                                                                                   |

**Personal Data Protection Law No. 6698****KVKK**

|                                                                                                        |                                                                                                                               |
|--------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Applies To</b>                                                                                      | Data controllers and processors within scope                                                                                  |
| <b>Operational Focus</b>                                                                               | Data-security measures, controller accountability, internal audits and notification when data is obtained unlawfully.         |
|  <b>Primary Fit</b> | Incident intake, assessment, investigation, notification workflow, corrective action, escalation and closure evidence.        |
|  <b>Primary Fit</b> | Audit universe, risk-based planning, RCM-linked testing, working papers, evidence, findings and follow-up.                    |
| <b>Scope Boundary</b>                                                                                  | Notification workflow and evidence can be configured. Submission to an authority requires an approved process or integration. |
| <b>Official Source</b>                                                                                 | <b>Open Official Source</b>                                                                                                   |

| <b>Board Decision No. 2019/10 on Breach Notification</b><br><b>KVKK</b>                                 |                                                                                                                               |
|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Applies To</b>                                                                                       | Data controllers, including relevant overseas controllers                                                                     |
| <b>Operational Focus</b>                                                                                | 72-hour Board notification, affected-person communication, breach documentation, response plans and accountable ownership.    |
|  <b>Primary Fit</b>    | Incident intake, assessment, investigation, notification workflow, corrective action, escalation and closure evidence.        |
|  <b>Supporting Fit</b> | Risk-based assurance, control design and effectiveness testing, evidence, findings and action follow-up.                      |
| <b>Scope Boundary</b>                                                                                   | Notification workflow and evidence can be configured. Submission to an authority requires an approved process or integration. |
| <b>Official Source</b>                                                                                  | <b>Open Official Source</b>                                                                                                   |

| <b>Research Review</b>                                             | <b>Primary Fit</b>                                  | <b>Supporting Fit</b>                                | <b>Not Shown</b>                                   |
|--------------------------------------------------------------------|-----------------------------------------------------|------------------------------------------------------|----------------------------------------------------|
| Official-source and product-fit review completed 1 September 2026. | Directly manages a central process or evidence set. | Contributes linked evidence, oversight or follow-up. | Weak or unsubstantiated relationships are omitted. |

## 05

## Brochure-Validated Product Capability

The mapping uses capabilities documented in the current TransVare solution briefs. It does not extend the platforms beyond their stated functional scope.



### Risk and Control Intelligence

Enterprise risk ownership, risk and control registers, assessments, appetite and tolerances, KRIs, treatments, approvals, dashboards and board reporting.

Central risk and control register | KRI threshold alerts | Treatment action tracking | AI-assisted drafting and classification



### Independent Assurance

Audit universe, risk-based planning, engagement execution, RCM-linked control testing, evidence, findings, approvals and follow-up.

Risk-based audit planning | ToD and ToE procedures | Working papers and evidence | GIAS 2024 observation drafting



### Incident Response and Closure

Incident intake, triage, investigation, root-cause analysis, escalation, notifications, corrective action, closure and lessons learned.

Central incident register | Investigation and root cause | Escalation and notifications | Corrective-action tracking

### Scope Boundary

The platforms support governance workflows, accountability, evidence and reporting. They do not calculate regulatory capital or liquidity, replace technical cybersecurity monitoring, provide legal interpretation, issue external-audit opinions or automatically file statutory notifications unless an approved integration and process are configured.

## 06 Sources, Scope and Next Step

Official sources used in this report are linked directly from each regulation summary. The mapping is an implementation aid and not legal advice.

|    |                                                                                  |                 |
|----|----------------------------------------------------------------------------------|-----------------|
| 01 | <b>Banking Law No. 5411</b><br>BRSA                                              | Official Source |
| 02 | <b>Regulation on Information Systems and Electronic Banking Services</b><br>BRSA | Official Source |
| 03 | <b>Communique on Corporate Governance II-17.1</b><br>CMB                         | Official Source |
| 04 | <b>Personal Data Protection Law No. 6698</b><br>KVKK                             | Official Source |
| 05 | <b>Board Decision No. 2019/10 on Breach Notification</b><br>KVKK                 | Official Source |

TransVare provides configurable technology to support governance, risk, audit and incident-management processes. Platform use does not, by itself, constitute or guarantee regulatory compliance. Applicability depends on entity type, licence, sector and current legal requirements. Obtain professional advice before relying on any regulatory mapping.

### THE NEXT STEP

# Build a Connected GRC Operating Model for Turkey.

See how TransVare can support local regulatory readiness while preserving regional visibility and board oversight.

#### TransVare Arabia

Building #7386, Abi Jafar Al Qurtabi  
Street (Exit 5)  
Al-Maseef, Riyadh 12467, Saudi Arabia

#### For Local Alliance Partner and Sales Contact:

[Connect@TransVare.com](mailto:Connect@TransVare.com)  
[TransVare.com](https://TransVare.com)