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## THE REGULATORY POWER OF THE EUROPEAN UNION IN RELATIONS WITH TÜRKİYE AND THE BRUSSELS EFFECT ON TURKISH REGULATION IN THE AREA OF DIGITAL POLICY AND NEW TECHNOLOGIES

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**ABSTRACT:** *The European Union, due to the promotion of its own market standards and the externalization of the norms it has developed, has been referred to in the literature as a “regulatory power”, and the influence it exerts as the “Brussels effect.” One of the states that, as a result of the Europeanization process, is implementing EU solutions and is subject to the Brussels effect is Türkiye. The EU is an important regulatory entity in the field of digital markets and artificial intelligence. It can therefore be assumed that this area also concerns the convergence of the policies and laws of the European Union and Türkiye. The purpose of this article is to answer the following question: Are the solutions undertaken in the field of digital markets and new technologies in Türkiye the result of the Brussels effect and the EU's regulatory power? In order to answer the above question, the article first clarifies the definition of the EU's regulatory power and presents the framework of this concept. Then, during the research process, an analysis of three issues in the sphere of the digital market and new technologies and the impact of EU regulations on Turkish law was carried out. The spheres selected for analysis are: personal data protection, digital markets, and artificial intelligence.*

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**KEYWORDS:** Brussels Effect; European Union; Digital Markets; Türkiye; Artificial Intelligence.

### 1. Introduction

The ability of the European Union (EU) to externalize norms and promote its own market standards is referred to in the literature as the “Brussels effect” and “regulatory power” (Bradford, 2020). In recent years, the impact of EU solutions has been particularly noticeable in the digital sphere. The EU has proven to be one of the pioneers in this new field of regulation (Yoshizawa, 2024, p. 2). Its regulations, for example, regarding identical chargers, forced Apple to abandon its previous solutions in favor of those adopted by the EU. In turn, the privacy policies of companies such as Google, Facebook, and Microsoft applied worldwide refer to the European General Data Protection Regulation (GDPR) (Malarz, 2024). Although in recent years the Brussels effect in the global sphere has been assessed as decreasing, among others in the context of the decline of the EU's share in the global economy. The EU is one of the largest and richest consumer markets in the world. This issue does not allow global corporations to approach the EU's market with indifference.

Other states are also following the EU model and introducing similar regulations. They are convinced,

among other things, by the quality of EU legislation, which has gone through a long and complicated legislative process. In addition, international companies offer their products and services on markets outside the EU in accordance with its legislation. These companies therefore address demands to the governments of the countries in which they operate to harmonize their national regulations with the EU *acquis*. The same may be true for local companies (Bradford, 2021). The Brussels effect thus manifests itself in two ways: (1) in terms of changes in the way international companies operate, and (2) in adapting the legislation of other countries in line with the requirements of international companies (Doğru 2022).

Türkiye has also been taking steps to move closer to the European Union for many years. Although formally, the country has to adopt certain EU regulations due to its candidate status. Given that this process has been going on for a long time and is also uncertain, the result is partial and uneven implementation of EU solutions (Korkmaz Tümer, Van Zeben, 2024, p. 1). Although this style of policy is maintained in some areas, it seems that the issue of the digital market and new technologies cannot be included in it. Against this background, the following research question is posed: Are the solutions taken in the field of digital markets and new technologies in Türkiye the result of the Brussels effect and the EU's regulatory power? In order to answer this question, this article first clarifies the definition of the EU's regulatory power and presents the framework of this concept. Then, in order to better understand the EU's regulatory role, an analysis of three issues in the field of the digital market and new technologies is carried out. These are regulations on the protection of personal data, regulations on digital markets, and solutions in the field of artificial intelligence. The study used the desk research method and comparative analysis. The application of this last method is aimed at comparing Turkish law with EU regulations.

### **Theoretical Framework: The Brussels Effect and the EU's Regulatory Power**

The concept of the Brussels effect was created in 2012 by Anu Bradford. It is based on the California effect, which describes a “regulatory race to the top” within the United States (USA, U.S., US) (Princen, 1999, p. 1). It refers to California regulations, including those concerning employee and consumer protection, freedom of the press, building codes, data security, and technology regulations, which are among the most frequently implemented in other US states. As early as the 1970s, California legislators insisted on an exception to the national Clean Air Act, imposing stricter regulations on car manufacturers that wanted to sell their cars within the state. Fearing loss of market share, both domestic and foreign manufacturers successfully lobbied their own legislators to introduce standards modelled on California's legislation (Tager, Lee, 2023). Since then, California's law has become the norm throughout the country (Fredriksson, Millimet, 2022) and in other states as well.

The Brussels effect as a concept transfers the California effect to the international system and identifies

the conditions and mechanisms by which the externalization of legal regulations of the European Union occurs (Tamim, 2024). According to Brandford, the rules and regulations adopted by the community have permeated many aspects of economic life in Europe and beyond. This has occurred through the process of unilateral regulatory globalization, which is referred to as the Brussels effect, (Columbia Law School, 2025) taking place through market mechanisms. “Unilateral regulatory globalization is a development where a law of one jurisdiction migrates into another in the absence of the former actively imposing it or the latter willingly adopting it” (Bradford, 2015, p. 159). This is a different situation from the case of political regulatory globalization, within which political bodies adopt standards through negotiation and agree to comply with them. And also unilateral coercion, within which regulations are adopted by means of threats or through the application of sanctions (Bradford, 2020, p. 4).

Achieving the Brussels Effect is possible if certain conditions are met. First, the entity must have a large local market. Therefore, only economies with significant market sizes can create global regulatory standards. However, being a large market is not a sufficient condition for exerting global regulatory power, as the examples of the USA and China show. The entity must also have significant regulatory capabilities and capacities, and the EU has the institutional structures and necessary expertise that allow for effective creation and enforcement of regulations. Moreover, the entity through which the Brussels Effect is carried out tends to enforce strict rules for inflexible purposes (e.g., consumer markets) as opposed to flexible purposes (e.g., capital) (Bradford, 2015, p. 159). In the case of the EU, the regulations adopted are often much more comprehensive and demanding than those established by other entities. This reflects the EU's significant commitment to building standards in the field of, among others, the protection of consumer interests. The EU's focus on regulating this sector has limited the possibility of companies relocating and avoiding EU regulations if their goal is to enter the European market (The European Crypto Initiative, 2024). The Brussels effect therefore occurs when companies conclude that it is in their interest to pursue a uniform conduct or production pattern rather than benefit from lower regulations in other markets (Bradford, 2021). Thus, the important issue is that the benefits of adopting a single global standard outweigh the benefits of complying with multiple regulatory standards, including less stringent ones (Bradford, 2015, p. 159).

In order to understand the Brussels effect, it is important to articulate the differences between the de facto effect and the de jure effect. The de facto Brussels effect concerns the unilateral ability of the EU to regulate global markets by setting standards in areas such as competition policy, environmental protection, food safety, privacy protection, or regulations on hate speech in social media. In this case, the EU does not have to impose its standards on other entities through coercion, because they are the result of market forces (Bradford, 2021). Therefore, companies themselves, when certain conditions are met, decide to comply with EU regulations for their products or services in the international arena (Tamim, 2024).

The de jure effect, in turn, is to some extent a complement to the de facto effect. It can occur when companies, after deciding to adopt EU regulations for their product in other markets, lobby governments outside the EU to adopt EU solutions. When a given foreign government decides to adopt a rule similar to the EU rule in its legal acquis and adopt “EU-style” (Bradford, 2021) regulations, then the de facto effect becomes a de jure rule (Tamim, 2024).

The characteristics of the European Union allow it to be described as a European regulatory power that externalizes its policies and regulations related to the market. According to Chad Damro, this externalization has until recently been overlooked as a way in which the EU exercises its power in the international system. However, this can be both a deliberate and unintended action to regulate given issues on a global scale. This means that the EU actually has greater possibilities and is more willing to use coercive means and tools than those indicated until recently by the concepts characterizing its power. The EU's approach to adopting certain solutions is the result of its own policies, political preferences, and the complex process of law-making at the European level. In some areas, however, there is a greater awareness of the EU's ability to set global standards in areas of emerging law than in others (Damro, 2011, p. 1). Ignacio Garcia Bercero and Kalypso Nicolaidis draw similar conclusions. They point out that, on the one hand, the EU's aspiration to use access to its market can be a means to achieve its own geopolitical goals through the use of a unilateral tool of power. This is because the EU simply has the ability to do so. On the other hand, the EU's regulatory power allows it to play the role of a “responsible authority” in world politics. This is achieved by projecting a rules-based approach to regulation. In this case, territorial expansion is based on normatively clear goals that strengthen international institutions (such as the World Trade Organization or the Paris Agreements) (Garcia Bercero, Nicolaidis, 2021, p. 15).

According to Theodore Christakis, however, there are several limits to what Europe can and wants to regulate, and these are due to both internal and external factors. Internal regulatory actions can be blocked by political disagreements between EU member states. In addition, they can be limited by legal obstacles (starting with the exclusion of national security) or economic considerations (as an example, he points to the fear of excessive regulation of artificial intelligence (AI), which could hinder innovation and affect competitiveness). External regulatory factors, in turn, constitute situations of interdependence that may make international cooperation necessary to avoid retaliation and find constructive solutions to resolve conflicts of law and jurisdiction (Christakis, 2020, p. i).

## **2. The Regulatory Power of the European Union and Cooperation with Other States in the Field of the Digital Market and New Technologies**

Digital diplomacy has become one of the tools of the EU's foreign policy on digital markets and technologies. The foundations of the EU's engagement in digital policy were set out in the Council Conclusions on EU Digital Diplomacy of July 18, 2022, and June 26, 2023 (The Diplomatic Service of the European Union, 2023). The European Union has decided to strengthen cooperation on digital issues in relevant multilateral forums. To this end, the EU is to, among other things, “address multilateral issues in digital partnerships and other relevant dialogues with countries around the world with a view to building consensus around EU positions and promoting the key principles underpinning its own regulations” (Rada Unii Europejskiej, 2023). The European Union is therefore engaging with other countries to promote their interests, norms, and values related to digital transformation. This is done through strategic partnerships, which provide a framework for regular bilateral exchanges at various levels (Lavenex, Krizic, Serrano, 2017, p. 4). With some partners, cooperation is structured and regular, while with others it is implemented through high-level dialogue. In the case of the United States, cooperation with the EU is implemented through the EU-U.S. Trade and Technology Council, which was established at the EU-U.S. Summit held in Brussels on June 15, 2021. It was established to coordinate approaches to key global issues in the areas of trade, economy, and technology and to deepen bilateral relations based on these shared values (European Commission, 2024). On April 4–5, 2024, the Council held its sixth ministerial meeting, during which it agreed, among other things, to develop transatlantic cooperation on artificial intelligence, 6G, semiconductors, and new technology standards, including those related to mapping digital identities.

Cooperation with India was also based on the framework of the EU-India Trade and Technology Council, announced in April 2022 and launched in February 2023. An important aspect of it was to use the strengths of both entities “to ensure their technological and industrial leadership while maintaining common values” (Think Tank European Parliament, 2024). For the EU, cooperation with India complements the partnerships signed with Asian countries (Japan: May 2022, Singapore: February 2023, and South Korea: November 2022), which aim to address issues related to digital exclusion as well as to strengthen “an inclusive and equal digital environment for all.” As part of this initiative, solutions were also adopted that are important for other EU actions, including in the field of digital transformation, the EU-Africa Shared Vision 2030, and the EU-Latin America and Caribbean (LAC) Digital Alliance (European Parliament, 2024).

In addition to the three aforementioned digital partnerships with Asian countries (Japan, Singapore, and Korea), the EU also launched a similar dialogue in November 2023 with Canada. It covered areas of cooperation such as artificial intelligence, secure international connectivity, cybersecurity, digital identity, and digital

skills. It aims to continue joint activities and exchange information in the area of platform regulation, as well as strengthen cooperation in developing best practices in countering the manipulation of foreign information and disinformation. The partnership (as with the other three) establishes an annual high-level meeting of the Digital Partnership Board. It is chaired by the EU Commissioner for the Internal Market and the relevant minister for each of the four partner countries. The Digital Partnership Board is tasked with providing political leadership and setting and implementing priorities (European Commission, 2023).

In terms of regulating the digital market, the European Union also engages in dialogue with entities that do not necessarily share all of its values. China is one such example. So far, the European Union has held two High-level Digital Dialogues with representatives of this state (September 2020, September 2023). During the last of them, the European Commission presented, among other things, an update of EU regulatory changes (including the Digital Services Act and the Digital Markets Act). It also expressed its concern about the difficulties faced by EU companies in China due to the growing amount of foreign data processed by Chinese entities and the control of this process by the Chinese authorities (Przychodniak, 2024). It also called for ensuring a reciprocal business environment in the digital sector (European Commission, 2023a).

Thus, since 2015, the EU has begun to achieve significant success in externalizing its norms and principles in the arena of digital policy. As Annegret Bendiek and Isabella Stürzer note, the EU's regulatory authority in digital foreign policy stems from its economic strength. According to the researchers, this is evidenced by the fact that digital technology companies from outside Europe (mainly from the US and China) are adjusting the terms of their services in such a way as to ensure access to the European internal market (Bendiek, Stürzer, 2022, p. 1). However, it seems that the size of the EU market, as well as the lack of significant US action on digital regulation, were the reasons why countries and companies started to use European solutions (Hobbs, 2020).

### **3. Türkiye as an Example of the European Union's Influence in the Field of Digital Policy**

The European Union is not a military power and also has limited influence through imposing financial sanctions on third countries. However, as the example of digital policy shows, its regulatory power allows it to be defined as an international entity that prepares a qualitative legal framework that is applied in many areas of people's lives around the world. The mechanism developed within the EU institutions is also an effective instrument for motivating other countries to adopt European regulations. Inter-institutional and multi-level shaping of policies in the EU forum affects the legal certainty and credibility of European strategic goals and political commitments in the eyes of partners (Bendiek, Stuerzer, 2023).

Other states are ready to use EU models for a reason, and one example is Türkiye. For many years, this

country has been trying to approximate its legal *acquis communautaire*. Recently, digital policy has also become an important element of cooperation at the Türkiye-EU level. In 2023, the European Commission signed an association agreement with Türkiye under the Digital Europe Programme. Thanks to it, companies, public administration, and eligible Turkish organizations will have access to the Digital Europe Programme budget for 2021-2027. Digital development in Türkiye is possible in areas such as artificial intelligence or advanced digital skills. It also offers an opportunity to strengthen Türkiye-EU digital technology ties by using Ankara's potential in areas covered by EU programs (European Commission, 2023b). Given Türkiye's strategic geopolitical location, cooperation in digital policy can significantly contribute to the country's economic and social rapprochement with the EU. EU-Türkiye relations in the field of digital policy, in addition to promoting technological progress and economic growth, will have a number of consequences for regional stability and international partnerships.

### **The Impact of EU Regulations on Personal Data Protection on Turkish Law**

In the face of the growth of the data-driven economy, the European Union has become a leader in attempts to protect data and privacy rights with the General Data Protection Regulation (GDPR) (Raines, 2020). Although this document applies primarily within the EU, its extraterritorial scope requires companies around the world to comply with its provisions when processing the personal data of EU residents (The European Crypto Initiative, 2024). The willingness of other entities to support the GDPR principles is closely linked to their enforcement. This is a key factor in the EU's ability to unilaterally influence the global behaviour of companies (Mahieu, R., et al., 2021, p. 301). Failure to comply with the GDPR provisions results in severe sanctions. Data breaches are punishable by financial penalties of up to EUR 20 million, or 4% of the company's global turnover. In addition, the Office for Data Protection may impose additional remedial measures, such as an order to cease processing personal data (Your Europe, 2024).

As for Türkiye, the first data protection law was prepared based on the provisions of EU Directive 95/46. Part of the EU regulations were then reflected in the Personal Data Protection Act No. 6698 of April 7, 2016 (Kişisel Verileri Koruma Kanunu - KVKK) (KVKK, 2016). In turn, after 2020, various other political documents showed that the direction of their adjustments would be related to the EU GDPR. This evolution was defined as a response to the needs of the business ecosystem. In addition, the urgent need for change was also emphasized by new challenges in the processing of special categories of personal data, especially for employers and the healthcare sector (Güven Taştan, 2024). According to Asli Deniz Helvacioğlu and Hanna Stakheyeva, both the Turkish and EU data protection systems have three objectives, which, although they are competitive, are complementary to each other. They define them as (1) protecting the personal data of natural persons (citizen aspect); (2) strengthening the capabilities of technology markets (business aspect); and (3)

ensuring an effective system that monitors and regulates the relationship between the company and the data owner (governance aspect) (Helvacioğlu, Stakheyeva, 2017).

The secondary law introduced in Türkiye in the form of regulations and announcements has therefore led to a similar development of changes to those that the GDPR has caused in the EU. There are many similarities in the areas covered by the KVKK and the GDPR. Among them, the subject scope can be identified, as both legal acts provide comparable definitions of key concepts such as personal data, sensitive data, and processing. In addition, they apply to the processing of personal data in an automated or non-automated manner if the data is part of a submission system. Also, in terms of the general obligations specified in both documents, both for data controllers and data processors, both documents are similar. They concern, among other things, obligations regarding the rights of data subjects, notifications of data breaches, and data security measures. In some cases, these are identical regulations. For example, both the GDPR and the KVKK provide for a 72-hour period for notifying the competent supervisory authority of a breach (OneTrust DataGuidance, Esin Attorney Partnership, 2020, p. 5).

In addition, the provisions of both legal acts are enforced by data protection authorities (DPAs) and through legal claims filed by data subjects. In the case of Türkiye, responsibility in this area falls to the Turkish data protection authority, Kişisel Verileri Koruma Kurumu. In the case of the EU, each Member State has at least one national data protection authority responsible for enforcing the provisions of the GDPR (Bateman, Pegarella, 2024). Both documents also provide for fines. However, those regulated by the GDPR are significantly higher than those regulated by the KVKK (Uz, 2020). The upper limit of fines under the KVKK is set at TRY 20,000 to TRY 1,000,000. In turn, the upper limit under the GDPR can be set at EUR 20,000,000, or 4% of the annual turnover of the previous tax year. The maximum fines under the KVKK can range from TRY 5,000 to TRY 1 million (USD 186 to USD 37,300). Under the GDPR, they reach an amount of up to EUR 20 million (or USD 21.4 million) or 4% of annual turnover. In addition to differences in administrative penalties, both documents also address other issues in different ways, including the liability of data protection officers and the right to be forgotten (Güner, Güner, 2019, p. 52-53). And although the GDPR is longer and more detailed than the KVKK, in both cases the data protection framework is solid and imposes many obligations on companies (Bateman, Pegarella, 2024).

### **EU Digital Markets Act and the “Brussels Effect” in the Case of Türkiye’s Regulation**

Another example of the European Union's Brussels effect is the Digital Markets Act (DMA), which came into force on November 1, 2022 (European Commission, 2022). However, it should be noted that its full implementation took place in the following months. The DMA regulations therefore went beyond Europe even before their practical effect was tested (Kiss, 2024). This was done by introducing similar rules for tech giants

and innovations around the world. EU regulations for large technology companies, referred to as “gatekeepers” (Alphabet, Amazon, Apple, ByteDance, Meta, and Microsoft), regulate numerous prohibitions and orders to limit the use of personal data in the course of services provided by “gatekeepers” (Meretz, 2024). The DMA imposes on companies, among other things, rules on avoiding anti-competitive data practices, giving users control over settings and software, and ensuring fair treatment of business users and other service providers. An important aspect of the DMA is “interoperability of communication services,” through which gatekeepers are ordered to ensure that their platforms work smoothly with other entities (Kiss, 2024).

Over time, it has become clear that the Regulation, along with every other element of the legal framework currently governing digital markets in the EU, may have the effect of reducing competition. One of the concerns was the shift from an ex-post to an ex-ante regulatory regime through the wide range of prohibitions that ignore the nature and nuances of competition contained in the DMA. The proactive rules were established before specific anti-competitive activities occurred. They may therefore inadvertently influence pro-competitive behavior or fail to address the anti-competitive practices they were intended to prevent. In practice, this may have unintended consequences (Kiss, 2024), such as reducing competition and stifling innovation in the EU (Meretz, 2024).

In order to address the challenges of digital markets, in October 2022, Türkiye published the Draft Regulation on Amending Law on the Protection of Competition. The provisions of the document concern amendments to Law No. 4054 on the Protection of Competition. The publication of the proposal was aimed at gauging public opinion on the proposed changes. The new regulations on digital markets in Türkiye and ensuring the protection of the competitive environment of these markets were prepared in light of the EU DMA as well as the provisions of §19a of the German Act against Restraints of Competition (Gesetz gegen Wettbewerbsbeschränkungen – GWB) (Girgin, Horozoğlu, Utku Çal, 2023, p. 16). They mainly included defining the basic services of platforms and imposing specific obligations and restrictions on undertakings with significant market power.

In June 2024, a new version of the proposed amendments to Law No. 4054 was made available to some parties for feedback and comments (Doğan, 2024). Parliamentary discussions on the provisions of the document, known as the “Turkish DMA,” are scheduled for December 2024 (Coniglio, Kiss, 2024). In the case of several key provisions and definitions, the draft Turkish law even copies the provisions of the DMA and, in some cases, applies even more stringent regulations. In this way, lawmakers aim to reduce competitive harm in the digital services market while ensuring that the positive economic effects of digital access are preserved (Dailey, 2024, p. P2). However, some analysts express concerns that the new EU-inspired regulations (like the DSA) are actually aimed at limiting the growth of disinformation on social media (Broadbent, Strezewski, 2024).

#### **4. EU Artificial Intelligence Act and Türkiye**

The European Union (EU) Artificial Intelligence Act (AI Act, AIA) was published in the Official Journal of the EU on July 12, 2024, and entered into force on August 1, 2024. The law aims to establish the first comprehensive regulatory regime for AI.

Even before it entered into force, it was described as a law that “will not stop at the EU’s borders” and will set global standards (Engler, 2022). This pioneering regulation provides guidance to many countries in defining their national policies and strategies, as well as in legislative actions on AI and related issues (Yavuzdoğan Okumuş, Talay, Takmaz, 2024).

The EU’s drive to be a pioneer in comprehensive regulation of AI technologies has resulted in the development of regulations that significantly influence how countries such as Türkiye deal with the integration of AI into their technology and economic regulations (Ünsal Özden, 2024). One of the major steps taken by the Turkish government in the context of the AI roadmap and its application was the announcement of the National AI Strategy for 2021-2025 on August 20, 2021. This action was described as a step of fundamental importance for Türkiye's future in the international arena. When properly adapted and used, AI technology has the ability to boost the country's economy while providing strategic benefits, resulting in greater global influence (Shkurti Özdemir, 2021, p. 5).

Following the publication of the EU AI Act, Türkiye also prepared a draft law on the regulation of artificial intelligence (Draft No. 2/2234, the so-called “AI Bill”) (Werner, 2024). It was submitted to the Grand National Assembly of Türkiye on June 24, 2024 (TBMM, 2024) and is currently undergoing the legislative process. The document consists of eight articles that aim to “ensure the safe, ethical, and fair use of artificial intelligence technologies, ensure the protection of personal data, prevent violations of privacy rights, and establish a regulatory framework for the development and use of artificial intelligence systems” (TBMM, 2024). Türkiye's AI proposals are therefore based on the principles of security, transparency, equality, responsibility, and privacy. However, they lack details on how to adopt and enforce the established principles in practice (Insight, 2024).

One of the most serious shortcomings of the Turkish draft, according to lawyers, is the introduction of general regulations on risk management and assessment instead of specifying all the risk levels, measures, and compliance assessment defined in the EU Act. The EU solutions establish four main risk levels: (1) unacceptable, (2) high, (3) limited, and (4) low risk. At the same time, they define the compliance requirements and obligations of users and developers with each specified level. The Turkish draft lacks such a classification, limiting itself only to the statement that “risk assessment should be carried out during the development and

use of AI systems” (Yavuzdoğan Okumuş, Talay, Takmaz, 2024). Another problem is the amount of penalties specified in the Turkish AI Law. For using prohibited AI applications or systems, a penalty of up to 35 million Turkish liras (approx. 1 million US dollars) or up to 7 percent of the entity's global turnover from the previous tax year may be imposed. In turn, failure to comply with the provisions of the AI Law may result in a fine of up to 15 million TL (approx. 455,000 USD) or 3 percent of the entity's global turnover from the previous tax year. A fine of 7.5 million Turkish liras (approx. USD 245,000) or 1.5% of the entity's global turnover from the previous tax year is imposed for providing false information (Insight, 2024). According to Begüm Yavuzdoğan Okumuş, Yalçın Umut Talay and Seda Takmaz, such a regulation of penalties may lead to the establishment of quite high monetary limits for Türkiye, which could potentially limit the activity of technology companies in this country. The Turkish draft has some provisions that raise concerns and is less comprehensive compared to the EU AI Act. The transformation of the regulations into more detailed solutions will therefore relate to developments in the EU (Çiftçi, Özdoğan, Öner, 2024).

## **5. Conclusions**

Analyses of the characteristics of the European Union as a participant in contemporary international relations primarily point to its role as a “soft power.” Thus, the influence of the community of European states on the external environment primarily concerns the use of peaceful means as well as the promotion of democracy and human rights in the international arena. This aspect of the EU's foreign policy is based on a system of European values, deeply embedded in the *acquis communautaire* and the *acquis politique* of the EU (Barburska, 2016, p. 346). This is one of the reasons why Ian Manners has described the EU as a “normative power”, the strength of which is its ideology, opinions, and standards (Manners, 2002, p. 238-244).

Using the EU as a much stronger entity than the individual states that make it up gives the opportunity to participate in defining the possibilities of regulating diplomatic, strategic, economic, and social negotiations in the international arena. This aspect is used to a significant extent in international trade and the creation of regulations for the digital market and artificial intelligence. Actions in this area are extremely difficult. This is due to the continuous development of technology and the emergence of new phenomena in cyberspace. This situation therefore requires a departure from established ways of thinking and the need to create pioneering legal regulations, the effects of which are *de facto* difficult to predict in the long term (Centrum Analiz Klubu Jagiellońskiego, 2022). Therefore, certain practical solutions of EU regulations are often criticized, among others, for achieving effects opposite to those planned. However, the mechanisms developed within the EU structures are still an effective instrument for motivating companies to adopt European regulations. The EU is one of the largest and richest consumer markets in the world, which is why global corporations cannot ap-

proach its decisions with indifference. However, the EU's influence reaches not only foreign business practices, but also the political choices of other countries (Hadjiyianni, 2021, p. 243). The Brussels effect and the EU's regulatory power allow us to define the EU as a participant in international relations that prepares a qualitative legal framework applied in many areas of people's lives around the world.

The European Union has long been a point of reference for Türkiye. In recent years, the country's technology sector has grown at an impressive rate of 67% between 2012 and 2021. By 2022, the information and communication technology (ICT) industry accounted for around three percent of Türkiye's GDP. As a result, securing investment in this area has become a key economic priority for the Turkish government (Coniglio, Kiss, 2024, p. 3). Therefore, when it comes to modern technologies and services offered by digital leaders, Türkiye, "as one of many advanced developing countries, aspires to emulate Brussels in applying a comprehensive regulatory approach" (Broadbent, Strezewski, 2024). The fact that the country still intends to draw on the regulatory *acquis* of the European community is evidenced by, among other things, the plan to align the Personal Data Protection Act with the EU's General Data Protection Regulation (GDPR) (Presidency of the Republic of Türkiye, Presidency of Strategy and Budget, 2023). This goal was echoed in The Medium Term Program (2024-2026) announced by the Turkish government in 2023.

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