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DECISIONS TAKEN AT THE MEETING  
OF THE ADVERTISEMENT BOARD  
DATED MAY 15, 2025 AND  
NUMBERED 357

The Advertisement Board ("Board"), operating under the Ministry of Trade, reviewed 65 cases during its 357th session held on 15 May 2025. Following the evaluations, 56 of these cases were found to be in breach of the applicable legislation. Accordingly, cease and desist orders were issued, and a total administrative fine amounting to TRY 10,495,800 was imposed. Furthermore, access restriction measures were ordered in 5 cases to prevent consumer detriment.

With its May 2025 session, the Board has examined and assessed a total of 736 cases in the first five months of the year. In 661 of these cases, misleading advertisements or unfair commercial practices were identified. As a result, cease and desist orders were issued, accompanied by administrative fines totaling TRY 125,281,151.

During the same session, the Board also conducted inspections concerning user interface designs and online shopping practices that may interfere with consumers' rational decision-making processes. These inspections particularly focused on practices and advertisements that prominently feature goods, services, or suppliers which consumers would not ordinarily encounter under normal conditions.

## **The Advertisement Board's Intervention Regarding Misleading and Dark Pattern Practices in the Promotion of the YouTube Premium Trial Offer**

- It was determined that **Google Reklamcılık ve Pazarlama Ltd. Şti.** engaged in practices affecting consumer preferences and impairing rational decision-making processes in connection with the promotion of the YouTube Premium service on its website. Specifically, the subscription trial was offered with the phrase “Try for ₺0,” while requiring users to provide payment method details; the “individual” subscription option was pre-selected in the user interface; and in the mobile application, consumers who did not wish to benefit from the “2 months free” offer were only allowed to exit the prompt via a low-visibility “X” icon. These elements were found to mislead the average consumer, directing them toward transactions they would not normally engage in under standard conditions, and to include dark commercial design patterns (dark patterns). In this context, an administrative fine of TRY 863,580 and a cease-and-desist order were imposed on Google Reklamcılık ve Pazarlama Ltd. Şti.

## **The Advertisement Board Imposes Administrative Sanction on Hepsiburada for Misleading Installment Sale Advertisements**

- In a product advertisement published on the e-commerce platform [www.hepsiburada.com](http://www.hepsiburada.com) by **D-Market Elektronik Hizmetler ve Ticaret A.Ş.**, it was stated that the item could be purchased in “9 installments with no interest.” However, it was determined that this installment option was not made available at the payment stage. The Board assessed that this practice was deceptive and misleading to consumers, and that it constituted an attempt to gain commercial advantage in violation of the principles of accuracy and honesty. In this context, an administrative fine of TRY 863,580 and a cease-and-desist order were imposed on D-Market Elektronik Hizmetler ve Ticaret A.Ş.

## **Cease-and-Desist Order Imposed Due to Promotion Contrary to Geographical Indication Registration**

- It was determined that in the promotions of olive oil products offered for sale on the e-commerce platforms Hepsiburada and Trendyol, the term “Edremit” was used, although these products were not produced in accordance with the geographical indication “Edremit Olive Oil,” which is registered as a designation of origin under registration number 273 by the Turkish Patent and Trademark Office. Following the investigations, it was assessed that the promotions conducted by Ahmet Kapsız for the product under the “Almila” brand and by Hilmi Yazgan Zeytin Zeytinyağı Ltd. Şti. for the products under the “İdatat” brand created a misleading perception regarding the origin of the products among consumers and constituted imitation of the geographical indication. For these reasons, it was decided that both promotions violated the relevant legislation, and an order to cease the advertisements was issued.

- Similarly, it was determined that in the promotion of olive products under the “Aymis” brand, offered for sale via Trendyol by **Aymis Zeytincilik Tarım Gıda Otomotiv İnşaat Sanayi ve Ticaret Ltd. Şti.**, the expressions “Edremit Çizik Zeytin” and “Edremit Taş Kırma Zeytin” were used. However, it was established that these products were not produced in compliance with the geographical indication “Edremit Körfezi Yeşil Çizik Zeytini,” registered as a designation of origin under registration number 189 by the Turkish Patent and Trademark Office. Furthermore, the direct use of the olive variety in the product name was found to be in violation of the labeling regulations set forth in the Turkish Food Codex Table Olive Communiqué. It has been assessed that this practice creates a misleading and deceptive impression on consumers regarding the origin and content of the product. Consequently, it was concluded that the promotions were contrary to the applicable legislation, and an order to cease the advertisements was issued.

## Decisions of the Advertisement Board Regarding Misleading Discount Claims

- During an inspection conducted in the Suriçi district of Diyarbakır, it was determined that although the poster indicated a price reduction of the product from TRY 239 to TRY 199, a consumer was charged TRY 214 for the same product on the same date. The Board ruled that the advertisement was misleading due to the inconsistency between the promotional price and the actual sales price. Accordingly, the Board decided to issue a cease-and-desist order and impose an administrative fine of TRY 54,987.
- The promotion of the product “Dana Yürek,” offered for sale by Dijital Platform Gıda Hizmetleri A.Ş. through the Migros Virtual Market mobile application and website, was evaluated. It was determined that the product, listed as “10% discounted” on 4 December 2024, was not delivered to a consumer who purchased it on that date due to insufficient stock. This practice was assessed as misleading to consumers, and a cease-and-desist order was imposed on Dijital Platform Gıda Hizmetleri A.Ş. regarding the advertisements.

## **Sanction Imposed on ETİ Due to Packaging Without Campaign Participation Codes**

- It was determined that despite the claim that the products included in the campaign conducted by Eti Gıda Sanayi ve Ticaret Anonim Şirketi (“ETİ”) under the slogan “Happiness tastes like ETİ, great prizes in the ETİ Happy Box!” contained participation codes for the lottery on their packaging, some products did not have such codes, preventing consumers from participating in the campaign. Accordingly, the promotions were assessed as misleading and deceptive to consumers due to the failure to fulfill the campaign conditions in practice. Consequently, a cease-and-desist order was imposed on ETİ regarding the said advertisements.

## **Promotion and Sale of Products Falsely Advertised as Therapeutic Without Scientific Verification**

- It was determined that certain products offered for sale on the websites operated by DodoPharma, BŞDÜD, Momentum, and Arifoğlu contained indirect claims in their promotions suggesting effectiveness in the treatment of various diseases, thereby creating the impression among average consumers that these products have medicinal effects.
- The health claims included in these promotions were made without obtaining the necessary authorization from the relevant authority (Turkish Medicines and Medical Devices Agency - TITCK) and were not scientifically proven. Consequently, these claims were deemed misleading and deceptive to consumers. Accordingly, the Board decided to impose:
  - a cease-and-desist order on DodoPharma and BŞDÜD,
  - and a cease-and-desist order along with an administrative fine of TRY 863,580 on Momentum and Arifoğlu.

## **Sanction for Unfair Commercial Practices Imposed on MMC Publishing**

- It was established that advertisements broadcast on the Akıllı TV channel, operated by MMC Yayıncılık A.Ş., on 25 January 2025, invited consumers to engage in tele-shopping for the sale of land and housing by instructing them to send an SMS containing their name, city, and phone number to the number 6688. The investigation revealed that the advertiser failed to disclose its full trade name and contact details, did not provide sufficient information to consumers regarding the identity of the contracting party, and did not comply with the legal obligations prescribed under tele-shopping regulations. This conduct was deemed misleading and capable of influencing consumers' purchasing decisions, thereby violating the principles of honest competition. Accordingly, an administrative sanction was imposed on MMC Yayıncılık A.Ş.

## Intervention Against Advertisements that Mislead Consumers by Artificially Increasing Platform Visibility

- It was determined that **Sentius Teknoloji Yazılım Sanayi Ticaret Limited Şirketi ("Sentius")** promoted services on the website [www.corapreklam.com](http://www.corapreklam.com) using phrases such as "add followers/favorites/questions," "buy reviews," "download and review," and "buy starred reviews" under platforms such as "Trendyol," "Dolap," "Apple Store," "Play Store," and "Google Maps." Upon evaluation, it was found that reviews and interactions not based on genuine user experience were being provided in exchange for payment; that visibility and ratings on the mentioned platforms were artificially manipulated; that the spread of negative reviews was being suppressed; and that false evaluations were being promoted. This practice was assessed to mislead consumers based on factors that affect perceived reliability. The Board determined that these practices violated the provisions of the Law numbered 6502 on the Protection of Consumers and the Regulation on Commercial Advertisements and Unfair Commercial Practices, and accordingly decided to impose a cease publication order on the relevant advertisements of Sentius.

## Misleading Price Information in Real Estate Listings

- It was determined that various real estate listings published on the Hepsimlak website included the statement “TRY 1” as the sale price. The said listings were published on the platform by different real estate businesses. During the review process, the advertisers stated that the listings were created erroneously or as drafts and that the actual price information had not yet been determined; however, they failed to provide any information or documents to support these statements. Although it was stated that the phrase “TRY 1” was entered due to the platform’s requirement for a mandatory price field, this was considered misleading and deceptive for consumers. As a result of the evaluations, it was determined that the advertisers failed to fulfill their burden of proof by not submitting the information and documents requested within the scope of the review. Accordingly, it was decided to impose a cease publication order on the relevant advertisers.

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