1. How to find out if a natural or legal person holds or controls bank accounts in the country?

The questions taken place in this Questionnaire have been answered on behalf of Financial Crimes Investigation Board (MASAK), Turkish financial intelligence unit (FIU). MASAK and Its Authorities to Access Information At the outset, it should be noted that MASAK is an administrative authority working attached to the Ministry of Treasury and Finance and it has duties and powers in prevention of money laundering and terrorism financing (AML/CFT) field. As the FIU, MASAK mainly collects data, receives suspicious transaction reports, analyses and records them, produces intelligence and informs relevant units of the intelligence produced and outcomes of the analyses, when necessary, in the scope of AML/CFT according to the Article 231(1)(ç) of the Presidential Decree No.1. As seen, MASAK has duties and powers in AML/CFT area and has not direct role in preventing/detecting corruption. However, as one of the associated predicate offences of money laundering, MASAK contributes efforts against corruption in the AML/CFT context.

According to Article 231(1)(n) of the Presidential Decree No.1, MASAK has the authority to request all kinds of information and documents from public institutions and organizations, natural and legal persons, and unincorporated organizations. Based on this authority, when requested by MASAK (or examiners), public institutions and organizations, natural and legal persons, and unincorporated organizations should fully and accurately provide all kinds of information, documents and related records in every type of environment, any kind of information and passwords necessary for accessing to or making these records decipherable, and render necessary convenience. Those from whom information and documents are requested in accordance with the previous paragraph can not avoid giving information and documents by alleging the provisions of special laws, provided that the defense right is reserved (in accordance with the Article 7 of the Law No.5549 on Prevention of Laundering Proceeds of Crime).

In addition, an access system may be established by MASAK to the data processing systems of the public institutions and organizations, and institutions and organizations in the nature of public bodies which keep records regarding to economic activities, wealth items, tax liabilities, census information and illegal activities in accordance with their laws or activities within the principles and procedures defined together by the Ministry of Treasury and Finance and competent authorities of related Ministry and institutions and organizations in the nature of public bodies (Article 9 of the Law No.5549).

Answer: Based on the abovementioned authority, banks in Türkiye are required to send electronically all bank account information, including IBAN holding or controlling by natural and legal persons to the MASAK and this information is available in MASAK database in centralized manner.
In addition, Türkiye has a conviction based confiscation system with no extended confiscation provisions. Assets subject to confiscation (in this respect to be identified, traced and seized) are exclusively counted in Criminal Law (Law number: 5237) Article 55, where asset confiscation is regulated: (i) material benefits obtained through the commission of an offence, or constituting the subject of an offence or provided for the commission of an offence, (ii) economic proceeds obtained by the investment or conversion of the material benefits mentioned above. There is no specific legal provision for tracing these assets; general principles of criminal investigation (Criminal Procedure Law, Law number: 5271) apply. If, during a criminal investigation, it is determined that a crime has been committed and material benefits have been obtained through the commission of it, or constitute the subject of it or have been provided for the commission of it, these material benefits are identified and traced by the police unit which conducts the investigation. During this process, certain information and documentation about the ownership, concealment, transfer, consumption, investment and conversion of material benefits might be needed. In this case, the Public Prosecutor who is in charge of the investigation prepares & signs a disclosure order asking the relevant person or institution to provide the investigative police unit with applicable information and documents. Besides, according to article 128 of Criminal Procedure Law, judicial authorities may request an asset research report according to its relevance from Banking Regulation and Supervision Agency, Capital Markets Board, MASAK, Undersecretariat of Treasury and Public Oversight Accounting and Auditing Standards Authority. With the exception of motor vehicle records and trade registry, the Police has neither statutory power to compel persons or institutions to provide information and documentation that might be helpful for asset tracing, nor has authorization to access databases where this kind of information & documentation is kept.

According to the 5th article of the Presidential Decree No. 5, State Supervisory Council has the authority to acquire all kinds of confidential/open information and documents from public institutions or other natural and legal persons, including banks. These requests shall be fulfilled without delay.

Also, according to Law No. 3628 on Asset Declaration and the Fight Against Bribery and Corruption, when there is an allegation related to corruption as mentioned in this law, administrative investigative bodies have the authority to request information regarding the assets of relevant persons, including information of their bank accounts.

a) Has your country established a centralized account register or equivalent data retrieval system?
Yes, Türkiye has centralized equivalent data retrieval system on bank accounts hold or control by natural and legal persons.

b) Does your country intend to establish a centralized account register or equivalent data retrieval system?
We already have such a system.

C) If your country does not use a centralized account register or equivalent data retrieval system to obtain the relevant information, please indicate any other mechanism your country has to find out if a natural or legal person holds or controls bank accounts
in the country (e.g. an established channel for requesting all financial institutions to promptly disclose whether they have a named customer). Please describe what steps your country’s authorities need to take and the material requirements (such as reasonable grounds for suspicion) that need to be met in order to find out

i. if a given natural person is a bank account's

(1) legal owner

(2) beneficial owner

ii. who is a given bank account's

(1) legal owner

(2) beneficial owner.

Please also indicate, in particular, if a court order is necessary to request the information, how requests are transmitted to banks, the delay for banks to respond to requests, and remedies banks can use against requests.

Please also indicate how long it usually takes for authorities to access information.

According to Article 3 of the Law no 5549 on the Prevention of Laundering Proceeds of Crime, the obliged parties (including banks) shall identify the persons carrying out transactions and the persons on behalf or for the benefit of whom the transactions are conducted within or through the obliged parties before the transactions are conducted. An important amendment to Article 3 of the Regulation on Measures Regarding Prevention of Laundering Proceeds of Crime and Financing of Terrorism has been as “h) (Amended – Official Gazette – 10.06.2014/29026) Beneficial owner means natural person(s) who ultimately control(s) or own(s) natural person who carry out a transaction within an obliged party, or the natural persons, legal persons or unincorporated organizations on whose behalf a transaction is being conducted within an obliged party,… … …” in 2014. In the same Regulation Article 17/a has been added with the same amendment as “Identification of Beneficial Owner (Added – Official Gazette – 10.06.2014/29026) ARTICLE 17/A- (1) Obliged parties shall take necessary measures in order to detect the beneficial owner. (2) When establishing permanent business relationship with legal persons registered to trade registry, obliged parties shall identify, in accordance with article 6, the natural person partners holding more than twenty-five percent of the legal person’s shares as the beneficial owner. (3) In cases where there is a suspicion that the natural person partner holding more than twenty-five percent of the legal person’s shares is not the beneficial owner or where there is no natural person holding a share at this rate, necessary measures shall be taken in order to detect the natural person(s) who is/are ultimately controlling the legal person. And natural person(s) detected shall be considered as beneficial owner. (4) In cases where the beneficial owner is not detected within the scope of paragraphs 2 and 3, the natural person(s) holding the position of senior managing official, whose authorization to represent the legal person is/are registered to trade registry, shall be considered as beneficial owner. (5) Within the scope of permanent business relationship with other legal persons and unincorporated organizations, necessary measures shall be taken in order to detect the natural person(s) who is/are ultimately controlling the legal person. In case where the beneficial owner is not detected, the natural person(s) holding the position of senior managing official within them shall be considered as beneficial owner. (6) In the scope of the paragraphs (1) to (5), obliged parties
shall identify the beneficial owner and take necessary measures in order to verify the beneficial owner. In this framework, a notarized circular of signature including identity information can be used. (7) When establishing permanent business relationship with legal persons registered to trade registry, obliged parties shall also identify, in accordance with article 7, the legal person partners holding more than twenty-five percent of the legal person shares.”.

As mentioned above, all bank account information is sent by banks to MASAK and this information is available in MASAK database. In addition to information on legal owner of the bank account, the banks are also required to send information on the persons who are authorized to represent the owner of the bank account in this context. As to the beneficial owner information, in order to increase the accuracy and timeliness of beneficial ownership information, a Beneficial Ownership Registry was established in the Revenue Administration via the Communique published in the Official Gazette on 13.07.2021. According to the Communique:

• Corporate taxpayers are required to file beneficial owner information with their temporary tax returns (every 3 months) and annual corporate tax returns.

• Those who do not provide the required information, or provide missing or misleading information are to be sanctioned according to penal provisions of the Law No. 213 (Tax Procedure Law).

• If it is determined that the provided information is incorrect by MASAK through analysis, examination, or international information exchange, or by Tax Inspectors through their inspections, the Revenue Administration will be informed in order to make the necessary corrections and impose sanctions.

Pursuant to the above provisions of the Communique; the accuracy of the beneficial ownership information reported by the taxpayers are controlled by the Tax Inspectors during the tax inspections.

MASAK has direct access to abovementioned central beneficial ownership registry.

In addition, all obliged parties including banks and other financial institutions are required to take necessary measures in order to detect the beneficial owner according to the Article 17/A of the Regulation on Measures Regarding Prevention of Laundering Proceeds of Crime and Financing of Terrorism (RoM). The Article 17/A of the RoM reads as follows:

“Identification of Beneficial Owner

ARTICLE 17/A- (1) Obligated parties shall take necessary measures in order to detect the beneficial owner.

(2) When establishing permanent business relationship with legal persons registered to trade registry, obliged parties shall identify, in accordance with article 6, the natural person partners holding more than twenty-five percent of the legal person’s shares as the beneficial owner.

(3) In cases where there is a suspicion that the natural person partner holding more than twenty-five percent of the legal person’s shares is not the beneficial owner or where there is no natural person holding a share at this rate, necessary measures shall be taken in order to detect the natural person(s) who is/are ultimately controlling the legal person. And natural person(s) detected shall be considered as beneficial owner.
(4) In cases where the beneficial owner is not detected within the scope of paragraphs 2 and 3, the natural person(s) holding the position of senior managing official, whose authorization to represent the legal person is/are registered to trade registry, shall be considered as beneficial owner.

(5) Within the scope of permanent business relationship with other legal persons and unincorporated organizations, necessary measures shall be taken in order to detect the natural person(s) who is/are ultimately controlling the legal person. In case where the beneficial owner is not detected, the natural person(s) holding the position of senior managing official within them shall be considered as beneficial owner.

(6) In the scope of the paragraphs (1) to (5), obliged parties shall identify the beneficial owner and take necessary measures in order to verify the beneficial owner. In this framework, a notarized circular of signature including identity information can be used.

(7) When establishing permanent business relationship with legal persons registered to trade registry, obliged parties shall also identify, in accordance with article 7, the legal person partners holding more than twenty-five percent of the legal person shares.”

When required by MASAK or examiners in the AML/CFT context, beneficial owner information of the bank accounts as well as other required details of the bank accounts are sent by the banks electronically upon request. The banks are required to provide all kinds of information, documents etc. without delay according to the Article 31(1) of the RoM. Information and documents should be requested in writing except for urgent situations. A certain period of not less that 7 days is determined for submission of information and documents requested in writing. When information and documents are requested verbally, the request is confirmed in written form in accordance with the Article 31(4) of the RoM. In practice, the information required are provided by bank electronically in 1-3 days.

It should also be noted that no court order is necessary to request the information. In other words, MASAK (and examiners) can request directly from the banks based on the authority granted by the Presidential Decree No.1 and the Law No.5549 (see the explanation provided for the Question No.1 above).

d) Please indicate, if available, the yearly number of requests in 2014, 2015 and 2016 by law enforcement, anti-corruption and AML authorities

Yearly number of requests made by MASAK, Turkish FIU, (and examiners) from the banks in 2014, 2015 and 2016 in the AML/CFT context are as follows:

2014: 1,080; 2015: 1,922; 2016: 2,911.

e) Please indicate which of your country's law enforcement, anti-corruption and AML-authorities can request such information.

As mentioned above, MASAK (and examiners) can request information from the banks in the AML/CFT context. In addition, public prosecutor offices, courts, supervisory authorities, tax and customs administrations can request information from the banks in the framework of their duties and powers granted by relevant laws.

Questions f) - k) not applicable
2. How to find out if a natural or legal person owns real estate in the country?

It can be found out in two ways whether a real or legal person owns real estate in the country;

1- **Request to obtain information regarding real estate/s owned by a real or legal person personally or through his/her representative:**

Solely making a request is not sufficient to get informed regarding the ownership of property which is under guarantee pursuant to the article 35 titled "Right to Property" of the Constitution and the information set forth in the land registry in which other real or personal rights with regard to the ownership are registered. Pursuant to the article 1020 of Turkish Civil Code titled "Publicity of Land Registry"; "Land registry is open to the access of everyone. Every person who makes his/her interest credible can request that concerning page or documents in the land registry be shown to him/her in presence of the deed officer or a copy of such documents be produced", the interest must be proved with a credible reason or acceptable documents.

All of our units were notified by the General Announcement dated 12.11.2012, numbered 25-9357 and titled "Making the Interest Credible as stipulated under Turkish Civil Code Article 1020" of our Directorate General that;

- a person's property is the part of his/her private life and the confidentiality of this should remain untouched,
- sensitivity is shown on the issuance of personal data to others contrary to the law or seizure of data which belongs to another person following the Constitutional Amendment of 2010 and the amendment made in Turkish Criminal Code,
- the information mentioned in the land registry should not be shared except the persons who make their interest credible, otherwise, liability of damages shall arise within the scope of the article 1007 of Turkish Civil Code.

Real persons can access to any information about them through the website [https://webtapu.tkgm.gov.tr/](https://webtapu.tkgm.gov.tr/) by using their e-state passwords together with their Republic of Türkiye ID Numbers or Foreigner ID Numbers.

2- **Request to obtain information regarding real estate/s owned by a real or legal person following the demand of persons, institutions and establishments that prove its interest:**

In pursuance of the circular dated 08.08.2001, numbered 073/1556-2001/11 and titled "The Principles on the 'Issuance of Information and Documents in the Land Registry"; clarification has been made on those who are obliged to get the documents in the land registry examined as required by their duty and on the principles for the issuance of the information and documents regarding land registry as required by serving to other public institutions and establishments, and, as the restriction brought on the publicity of the population registers includes information on the personal status of real persons, that's to say, on marital status, birth date, place of registry which may interest the personal rights, it is not possible to give the existing register information in the land registry to any private or public law legal person except for the recruiting office, judicial authorities and the departments which take the approval of the
highest administrative authority of the locality, limiting the information solely with the name, surname and father's name of the owner. It is known that the criterion stipulated under the article 1020 of Turkish Civil Code is meticulously abided during the issuance of land registry and cadaster information and it is warned that information and documents should not be given by hand, facsimile or mail in response to the verbal orders and requests made to unrelated persons and institutions directly or by telephone and any opposite behavior shall bear administrative, financial and penal liability. According to the article 16 of the Land Registry Regulation, it is prescribed that no procedure shall be allowed on the land registry without the presence of written request except for the exemptions mentioned in this Regulation. It is set forth under the article 17 of the mentioned Regulation, it is detailed what kind of persons are eligible to make request. In the article 18, in order to determine the holder of the title, it regulated that the personal data should not be shared with any person except for the concerning person and that only the persons holding right in the land registry are able to make request. Therefore, it has been aimed to take the personal data under guarantee.

Following the Directive dated 10.11.2022 and numbered 6627760 titled "Declaration of Properties", it was informed that the requests of lawyers for information and documents should include;

a) The request must definitely be registered on the TAKBİS/Application Screen,

b) Concerning written land registry examination requests which are made without submitting power of attorney given by the property owner on behalf of whom a copy of the title deed is requested; it should be inquired over the MERNİS, official bond and other proving documents whether the property owner has any address record showing that s/he resides at abroad or if s/he is a blue card holder

c) If it is determined that the concerning person has residential address at abroad or s/he does not have any residential address in the country, a written document (cheque, bond, credit voucher, rental contract, execution proceeding letter etc.) encouraging that the requested information regarding the requested person shall be used in the country, and sharing information if the info regarding concrete immovable is inquired,

d) All kind of verbal requests inquiring assets and the written requests which are made by submitting the information of the property owner instead of the concrete immovable and also the requests which do not meet the points mentioned under the article (c) of this directive should be refused.

Conclusively; Ministry of Foreign Affairs is competent to determine and execute the principles with regard to the relations of the Republic of Türkiye with other states and it is a requirement of international law for the foreign state representative offices to maintain their relations with the institutions and establishments of the Republic of Türkiye by means of the Ministry of Foreign Affairs. Therefore, in case of any information and document (title deed, official bond etc.) requests made regarding the immovable in Türkiye by foreign institutions and establishments, foreign representative offices (Embassies, Missions, Consular Offices) and private law legal persons, foreigners or Turkish nationals whether residing at abroad or not, such requests are submitted by our Directorate General to the consideration of the Ministry of Foreign Affairs without conducting any inquiry.

However, pursuant to the money laundring prevention provisions and within the scope of suspicious transaction reports, there is no obstacle for the General Directorate of Land Registry
and Cadastre to submit all kind of information and documents related to its duty to the Financial Crimes Investigation Agency (MASAK).

The data related to the real estates of all real and legal persons in Türkiye is shared by making necessary restrictions within the scope of its interest, over the Land Registry and Cadastre Sharing System (TAKPAS) established by the General Directorate of Land Registry and Cadastre, as long as a protocol has been made with the approval of the TKGM data sharing supreme board within the scope of the Regulation on the Sharing of Land Registry and Cadastre Data No. 29288.

3. How to find out if a natural or legal person owns a company/business in the country?

Commercial enterprises and companies are established by registering to trade registry. The trade registry is kept by 238 directorates of commercial registry which operates within chambers of commerce and industry under the supervision and oversight of the Ministry of Customs and Trade. Commercial registry transactions are carried out on Central Registry System (MERSIS)

MERSIS is a centralized information system that allows carrying out the commercial registry processes and storing the commercial registry data electronically. Pilot application has been initiated in Mersin Commercial Registry in May 2010. Following the completion of the pilot project in December 2013, the system was activated on 1 January 2015, in 238 directorates of commercial registry. Currently, all the commercial registry relating to commercial enterprises and companies which is operating in Turkey has been transferred to MERSIS and the commercial registry processes in all directorates of commercial registry are carried out electronically via MERSIS. MERSIS was updated at the beginning of 2017, and the new version of the system is operational since 6 March 2017.

The system enables rapid access to information of the owners or directors of a company. Inquiries and investigations may be conducted into the ownership of legal persons and through government authorities’ powers to compel production of information by following a trail of ownership through a series of legal persons back to the actual persons owning or controlling the entities. As of 31 March 2023, MERSIS has 2,287,229 users.

According to article 124 of Turkish Commercial Code, commercial companies are general partnerships, limited partnerships, joint-stock companies, limited companies and cooperative companies. Joint stock companies and limited companies are most commonly preferred types of companies in Turkey.

According to the data obtained from MERSIS, as of 31 March 2023, there are 183,965 jointstock, 1,118,890 limited companies, 10,653 collective companies, 1,907 comandite companies, 31,503 cooperatives and 638,961 commercial enterprises registered in Turkey.

Commercial companies and commercial enterprises are registered to Commercial Registry Office in the location where their head office is established. Commercial companies obliged to have a written articles of association and this document must be registered. In terms of commercial enterprises (sole traders) the establishment information is also registered. The names of founding partners are included in this information. According the Code, share
transfers are also registered in the commercial register except joint stock companies. Therefore, current shareholder information in all companies (except joint stock companies) and commercial enterprises is accessible from MERSIS.

The Turkish Capital Markets Law no 6362, designates the Central Securities Depository of Türkiye (MKK) as the only central securities depository for dematerialised securities including shares/equities of publicly listed companies. MKK registers shares and the rights affixed to them electronically within its Central Dematerialised System (CDS) in book entry form on a beneficial owner basis. MKK also operates as the central registrar in Türkiye for registered and bearer securities of publicly listed companies. As such, according to the Article 13 of the Capital Market Law, the date of notification to MKK is taken as reference in claiming rights on publicly traded shares against third parties. Furthermore, according to the legislation, in registering the transfer of shares at the share register of companies pursuant to Article 417 of the Turkish Commercial Code, the records of ownership at MKK are taken as basis without the need for further application by any party.

MKK, shares the data held on the CDS with ministries, regulators, other financial market infrastructure institutions, professional organizations, data vendors, issuers, investors and public. The CBS data is shared periodically; on hourly, daily, weekly, monthly, quarterly and annually basis. Data sharing can be performed through; corporate integration, FTP, smart card, CDS reporting tools, and e-mail.

In accordance with the Articles 486 and 489 of the Turkish Commercial Code and as per the Article 13 of the Capital Market Law No. 6362, private joint stock companies, whose shares are not registered at MKK in dematerialized form, are under the obligation to notify MKK of their shareholders and their holdings in bearer form, before distributing any shares to shareholders. The information on (bearer) shareholders and their holdings, are registered electronically to MEK’s “Bearer Shares Registration System (HPKS) by the company representatives, who are defined in MERSIS by the company that have issued bearer shares.

4. How to find out if a natural or legal person has non-banking financial interests (life insurance portfolio where applicable, securities) in the country?

Insurance Information and Monitoring Center started its operations under the title of Insurance Information Center pursuant to the regulation published in the Official Gazette No. 26962 dated 9 August 2008 prepared by Undersecretariat of Treasury and its title was changed to Insurance Information and Monitoring Center with another regulation published in the Official Gazette No. 28131 dated 03/11/2011.

Insurance Information and Monitoring Center was founded as a non-commercial with legal entity in the body of Union of Insurance and Reinsurance Companies of Türkiye.


Individual pension products are more common and savings are safekept by Settlement and Custody Bank (Takasbank) from which information can be accessed.
It is aimed at gathering data in relevant branches in a single center, carrying out insurance activities more comprehensively and efficiently, ensuring implementation uniformity throughout the industry, enabling healthy pricing, preventing abuses, creating reliable statistics, increasing the confidence in insurance system and activating public monitoring-audit.

According to the Turkish Capital Markets Law no 6362, the Central Securities Depository of Türkiye (M KK) is the only central securities depository for dematerialised securities (e.g. equities, bonds, mutual funds, etc.) in Turkey. MEK is the financial accounts center in Türkiye, where dematerialised securities and the rights affixed to them are registered electronically in book entry form with respect to issuers, intermediary institutions and owners of rights. MKK is also the central registrar in Türkiye for registered and bearer securities. As such, according to the Article 13 of the Capital Market Law, the date of notification to MKK is taken as reference in claiming rights on dematerialised securities against third parties. Nonbanking financial interests of natural or legal persons can be reported through MKK's Central Dematerialized System (CDS). Furthermore, as per the Capital Market Board's (CMB) authorisation, according to Article 87 of the Capital Market Law (No. 6362) and the related secondary regulations, MKK provides trade repository services for the reporting of over-the-counter derivatives and fixed income securities transactions by both financial and non-financial companies.

**Full List of Securities Held in Dematerialized Form at MKK:**

- Equities (Listed at the Borsa Istanbul)
- Mutual Funds
- Exchange Traded Funds (ETF)
- Corporate Bonds
- Commercial Papers
- Bank Bills
- Corporate Warrants
- Covered Bonds
- Asset-Backed Securities
- Government Debt Securities (Investor Holdings)
- Government Lease Certificates
- Private Sector Lease Certificates
- Electronic Warehouse Receipt
- Real Estate Certificates
- Gold Backed Lease Certificates
- Gold Backed Bonds
- Convertible Bonds
- Foreign Exchange Government Certificates
- Foreign Exchange Government Bonds

The provisions of the Capital Market Law (CML) and other laws related to the capital market are supervised and enforced by the Capital Market Board (CMB). Natural and legal persons from whom information is requested are not able to refuse to provide information by claiming confidentiality and secrecy provisions under Article 87 and 90 of the CML.

According to Article 128 of the CML, collaborating in any way and exchanging information regarding the capital market with equivalent foreign authorities is allowed.
Under Article 27 of Communiqué on Documentation and Record-Keeping System Regarding Investment Services and Activities and Ancillary Services (III-45.1), the intermediary institutions are obliged to keep all kinds of documents, including electronic documents, received or generated by them due to and in the course of their investment services and activities and ancillary services, all order forms relating to their customer orders, whether executed or not, and customer orders received in electronic media and the documents and fax records relating to such orders. Changes in addresses of the account holder customers included in their framework agreements, or changes in names of natural person customers or in titles of legal entity customers/investment funds are required to be reported by investment firms to the authorized clearing and custody institution and/or CSD immediately upon learning. When required, identity and address information of customers must be submitted to the Board and those charged by the Board.

Based on the authority explained for the Question No.1 above and protocols signed between MASAK and relevant authority, information on life insurance portfolio can be accessible on-line by MASAK. In addition, information on securities is also accessible off-line by MASAK based on the authority provided by the Law No.5549 and the protocol signed with relevant public institution.

5. How to find out if a natural person or legal person owns luxury goods such as boats or planes registered in the country?

All aircrafts and planes are registered under the Turkish Civil Aviation Act No.2920 of 1983. The registration records are kept by the Turkish Aircraft Register; in addition foreign aircrafts are required to obtain authorization from the Ministry of Transport, Maritime Affairs and Communications to fly on Turkish airspace. Article 20 states that conditions for registration and licensing for operations for individuals and companies by the Ministry of Transport, Maritime Affairs and Communications shall be as prescribed by the Ministry. This gives discretion and it is not automatic that the beneficial owner can easily be identified. The records are held by a public body and can be accessed without a court order.

There is a national registry for maritime vessels. To be able to find out if a natural or legal person has a maritime vessel Ministry of Transport, Maritime Affairs and Communication should be contacted.

Information on boats registered can be accessible on-line by MASAK based on the authority explained for the Question No.1 above and protocols signed between MASAK and relevant public institution. With regards to planes, data integration to MASAK has been concluded from the relevant public institution. So this information is also accessible by MASAK.

Ministry of Transport and Infrastructure has a protocol with the Revenue Administration so that these kind of information can be reached directly by the Administration with the help of a web service application.