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The Use of Digital Monitoring Technologies (Cookies) in Turkish, Romanian and Russian Internet Journalism: Comparative Privacy and Practice Criterion

*Türk, Romen ve Rus İnternet Haberciliğinde Dijital İzleme Teknolojilerinin (Cookies) Kullanımı: Karşılaştırmalı Mahremiyet ve Uygulama Ölçütleri**

Olga Untıla Kaplan**

Abstract: Cookies which exist in digital media for twenty years and have not yet revealed their existence, have begun to raise serious doubt in the community regarding the protection of personal data. This is a search for a new security model that sets borders out by expecting transnational privacy concept within the digital transformation of Internet journalism users accompanied by these monitoring technologies. In this study, the use of digital monitoring technologies (Cookies) in Turkish, Romanian and Russian Internet journalism is analyzed. However, the underlying factors behind the reassessment of the level of privacy that digital monitoring technologies can use as a principal element of digital security policy constitute the concrete frame of study with an example of a survey that demonstrates the extent to which Internet users are advocated for self-determination together with evaluation of “Cookies Create Boomerang Effect”. The literature and concept review used in the study, quantitative and qualitative research methods have made it possible to conduct an intercultural comparative evaluation of the concept of digital privacy, which interacts with internet journalism-digital monitoring technologies. As a result of the research, it has been found that the owners of the internet news sites partially accept the consumer demand, provided that the internet users reserve the right to protect their individual privacy. While half of the Turkish news sites examined in this study do not share complete information about the use of cookies, it has been determined that privacy and cookie policies are important in Romanian digital journalism. Most Russian news sites only share their privacy policies with registered users. Based on the data obtained as a result of the study, it has been revealed that Turkish, Romanian and Russian Internet users benefit from these policies as much as they have the right to self-determination. While meeting the needs of autonomy, competence and commitment, which explains the right to self-determination, is seen in Romanians, it can be described as “satisfactory” in Turks and in Russian, it is a situation where inadequacies are met in meeting these needs.

Structured abstract: The concept of technology-based surveillance, which also concerns internet journalism, which has gained new dimensions in the use of communication technologies, which has become widespread all over the world, was brought to the agenda. In the literature, this type of surveillance is called new

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** Dr. Öğr. Üye., İstanbul Medipol Üniversitesi, İletişim Fakültesi, Yeni Medya ve İletişim Assist. Prof., İstanbul Medipol University, Communication Faculty, New Media and Communication
ORCID 0000-0003-1525-4989
okaplan@medipol.edu.tr

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surveillance, informatics surveillance, electronic surveillance and digital surveillance (Çetin & Asıl, 2017). The main thing that can be said about surveillance is that it is an application that takes place between the surveillance and the surveillance. But the meaning of surveillance for these two sides is different. For those who supervise, surveillance is carried out in order to manage and control the behavior of individuals. Surveillance practice in this direction takes two forms. First, it refers to the accumulation of information that can be collected, used, and encrypted about individuals to manage their behavior. The second involves direct monitoring of the actions of individuals by those who establish authority over them. With these two forms of supervision, they have the opportunity to directly apply their supervisor authority, which has the opportunity to manage and control the behavior of individuals. In terms of the observer, surveillance is often reduced to reasons such as security, protection, peace of mind or a prerequisite for achieving a prosperous life (Çetin & Asıl, 2017).

It is also possible to observe the implementation of the said surveillance mechanism in internet journalism. In an environment that does not know space, time and limits, digital media companies have started to try different methods and applications to reach consumers. Every day, many notifications are sent to many people on the screen in the form of forms to create “customized” content. However, especially in recent years, it is discussed how the protection of personal data should be evaluated after the introduction of digital monitoring technologies hiding behind these notifications. The internet user, who is generally watched through cookie files, also informs the demographic features and e-mail address of the form that the site requests from him. Cookie files, which allow tracking the movements in the site, work by storing information that seems innocent at the first time and that will help the site improve itself, in the computer of the audience, inside the temporary internet files folder. Thus, the sites do not store this information load on their computers and take what is necessary for them (Birsen, 2005).

Cookies, which play an important role in determining the needs and desires of the information consumers, increase the attractiveness of news sites with the increasing use of internet every day. The main purpose of the websites is to create the perception that there is a trustworthy harmony between information producers and consumers. In order to reveal the role and importance of digital tracking technologies in internet journalism, the answer to the question of how much internet security is provided to users in this two-way interaction model has recently become one of the most sought-after topics. The main purpose of this study is; While making a three-dimensional assessment of the use of digital tracking technologies (Cookies) in Turkish, Romanian and Russian internet journalism, digital privacy models of internet journalism that compare the differences in the information security culture of users are examined.

Data collection techniques according to the objectives of the study:

Goal 1- To make a study based on first level quantitative observations to learn whether the most read news sites of Turkey, Romania and Russia includes privacy and cookies policy, whether they use cookies or not, what kind of cookies they include and to measure the duration of the cookies.

Data Collection Technique: The most popular 10 news sites were selected and compared from each country by analyzing over 30 digital news sites in terms of privacy and cookie policy.

Goal 2- The aim of this study is to present a study which can measure the effect of Turkish, Romanian and Russian privacy on the self-determination right of internet users representing three different cultures.

Data Collection Technique: Within the scope of 'structured interview' which is one of the 'in-depth interviews' in the research, and 'interview form approach' was preferred. Since this approach is prepared as a method “with the purpose of obtaining the same kind of information from different people in order to lean on similar subjects” (Kodak, 2018), it completes the concept of the research to be made among cultures. In the interviews, the questions asked to the total 30 Turkish, Romanian and Russian participants were prepared from literature search, within the frame and subject of the study, and in the light of the themes “the need of autonomy”, “the need of competency” and “the need of commitment” obtained related to self-determination right.

Quantitative and qualitative methods used in the research can be divided into two main groups. In the first group, there are findings explaining the effect of privacy and cookie policies on individual privacy in three dimensional internet journalism. In the second group, the findings of the interview interview conducted with

Turkish, Romanian and Russian participants named “Bumerang Effect-Creating Cookies” were used to measure the impact of privacy on internet users' self-determination.

Privacy and the cookie policies in internet journalism create different effects on the individual privacy. While half of Turkish news sites do not share full information on the use of cookies, they are presented to their users in a whole and complete manner by assigning a clear place to cookie policies in Romanian digital news sources. Russian news sites that develop a unique style share their privacy policies with generally registered users and do not provide cookies explaining information.

Based on the data obtained from the study, it was determined that Turkish, Romanian and Russian internet users benefited from these policies as much as they had the right to self-determination. In line with the, autonomy, competency and commitment needs that explains self-determination, the differences in the culture of information security of users have been revealed. Although the Turkish digital privacy model we have created has the choice of protecting the personal data, the need for autonomy is not met. An “inadequacy” situation that arises in the management of the cookie adds a negative connotation to the competency requirement of the Turks. There was no commitment to the news sites visited by Turks. In the Romanian digital privacy model, it has been observed that the protection of personal data is a very important issue, so users are insisting on meeting the need for autonomy. The competency need of Romanian users who are aware of the functions of cookie technology used in news sites can be considered as “conscious”. Their interest in news sites explains Romanian’s need for commitment: “often” or “every day”. In the Russian digital privacy model, it was observed that the users of the news site had a significant share in meeting the need for autonomy. Although they are mostly dissatisfied with the information they have about the protection of personal data in the digital environment, they are interested in monitoring technologies such as cookies to meet their competence needs. Also, it was observed that Russians did not have any commitment dimension to the news sites they visited.

As a result, we can say that the users of internet journalism, which is developing in company with this monitoring technologies -cookies-, are in a search of a new security model that reveals the limits by hiding behind the transnational privacy understanding in the digital transformation that they are in.

Keywords: Internet Journalism, Digital Monitoring Technologies, Privacy, Cookies

Öz: Yirmi yıldır dijital mecralarda dolaşan ve bu zamana dek varlığını belli etmeyen çerezler (Cookies), kişisel verilerin korunmasıyla ilgili toplumda ciddi şüphe uyandırmaya başlamıştır. Bu izleme teknolojilerin eşliğinde gelişen İnternet haberciliği kullanıcılarının buldukları dijital dönüşüm içinde bir ulusötesi mahremiyet anlayışına sığınarak, sınırları ortaya koyan yeni bir güvenlik modeli arayışında olmaktadır. Bu çalışmada dijital izleme teknolojilerinin (Cookies) Türk, Romen ve Rus İnternet haberciliğinde kullanımının analizi yapılmaktadır. Bununla birlikte, dijital izleme teknolojilerin, dijital güvenlik politikasının başat bir ögesi olarak kullanılabilir düzeyde mahremiyet anlayışının yeniden değerlendirmesinin ardında yatan unsurların, İnternet kullanıcıların self-determination hakkının ne ölçüde savunulduğu ortaya koyan bir mülakat örneğiyle - “Bumerang Etkisi Yaratan Çerezler” - birlikte incelenmesi çalışmanın somut çerçevesini oluşturmaktadır. Çalışmada kullanılan literatür ve kavram taraması, nicel ve nitel araştırma yöntemleri İnternet haberciliği-dijital izleme teknolojileri etkileşiminde bulunan dijital mahremiyet kavramının kültürlerarası karşılaştırmalı bir değerlendirme yapmamızı mümkün kılmıştır. Araştırma sonucunda, İnternet haber sitelerinin sahipleri, İnternet kullanıcılarının bireysel mahremiyet korumaya ilişkin hakları saklı tutmak kaydıyla, tüketici talebinin kısmen kabul ettiği bulunmuştur. Bu çalışmada incelenen Türk haber sitelerinin yarısı çerezlerin kullanımına ilişkin tam bilgi paylaşmazken, Romen dijital haberciliğinde gizlilik ve çerez politikaları önemli bir yer aldığı tespit edilmiştir. Rus haber sitelerinin çoğu ise, gizlilik politikalarını sadece kayıtlı olan kullanıcılarla paylaşmaktadırlar. Çalışma sonucunda elde edilen verilere dayanarak, Türk, Romen ve Rus İnternet kullanıcıların self-determination hakkına sahip oldukları kadar bu politikalardan yararlandıkları ortaya konulmuştur. Self-determination hakkını açıklayan özerklik, yeterlik ve bağımlılık ihtiyaçlarının en iyi şekilde karşılanması Romenlerde görülmekteyken, Türklerde “tatmin edici biçimde”, Ruslarda ise bu ihtiyaçların karşılanmasında yetersizliklerin gözlemlendiği bir durum olarak nitelendirilebilmektedir.

Anahtar Kelimeler: İnternet Haberciliği, Dijital İzleme Teknolojileri, Mahremiyet, Çerezler

1. Introduction

The cookies, which have been circulating in digital media for twenty years and have not been come through until now, have begun to raise serious suspicion in the society regarding the protection of personal data. The users of internet journalism, which is developing in company with this monitoring technologies, are in a search of a new security model that reveals the limits by hiding behind the transnational privacy understanding in the digital transformation that they are in. The main purpose of this study is to examine the underlying differences in comparative digital privacy models of the internet journalism users' information security culture, while making three dimensional evaluation about the use of digital monitoring models (cookies) in Turkish, Romanian and Russian internet journalism. Cookies, which play an important role in determining the needs and desires of the information consumers, increase the appeal of news sites with increasing internet usage. The main purpose of the websites is to create a perception that there is a trust that is based on trust between information producers and its consumers. In order to demonstrate the role and importance of digital monitoring technologies in internet journalism, the answer to the question of the degree to which internet users are in need of security in this bidirectional interaction model has recently become one of the most sought-after topics. In a study conducted in Turkey in 2005, the audience information collectors' responses to the question whether or not users are warned about the purpose for which this information is collected and how it will be used when collecting information and 58.3% of them said "yes we warn" and 42.7% of them said "no we don't warn" (Birsen, 2005). This study aims to support research on the use of Cookies in Turkish, Romanian and Russian internet journalism in order to protect personal data, taking into account the safety of internet users in a global environment. It is also important to emphasize how important it is to examine privacy and cookie policies through examples is also important in terms of presenting the framework of our study.

2. The Use of Cookies in Turkish, Romanian and Russian Internet Journalism

Cookies have been criticized about the protection of personal data since it was developed by Netscape Communications Corporation (Karahisar, 2015). Due to the privacy violation of Facebook, the world's largest social networking site, Internet users are experiencing difficulties in sharing their personal data because they do not know which settings should be made to protect their privacy. This has led to the need to review information security policies in many countries in electronic communications. There is also uncertainty about how prudent the internet news sites are in protecting personal data, applied security policies, and how to protect the fundamental rights and freedoms of the data owner. For this reason, it is useful to take a look at Turkish, Romanian and Russian personal data security models in order to reveal some differences in privacy and cookie policies used in internet journalism.

2.1. Turkish Personal Data Security Model

It is known that the subject of protection of personal data which has been discussed in the European Union since 1980s and which has legal, social and technical dimensions is far from interest in Turkey and that adequate measures have not been taken on this subject (Henkoğlu, 2015). By 2016, Turkey was allowing the protection of personal data with the Constitution and the Turkish Penal Code. With the 20th article of the Constitution says; "Everyone has the right to demand protection of personal data about him. This right covers; to be informed of personal data about him/her, to request access to these data, to correct or to delete them, to learn whether or not they are used for their purposes. Personal data may only be processed in the cases provided for in the law or with the express consent of the person. The principles and procedures for the protection of personal data are regulated by law" and this provision about personal data protection is in our law even though it remains within a constitutional framework (Karaarslan & al., 2014). However, in accordance with Article 135 of the Turkish Penal Code that says, "Anyone who records personal data in violation of the law shall be sentenced to imprisonment of one to three years" (5237 Sayılı Türk Ceza Kanunu,

2004), tries to protect personal data in Turkey. With the Law No. 6698 on the Protection of Personal Data published in the Official Gazette in 2016 and entered into force in 2017, the article of “Crimes and faults” were revealed as well as “the clarification liability of the data responsible” and “the rights of the relevant person”. According to this article, there is the provision of “An administrative fine can be applied from 5,000 Turkish Lira to 1,000,000 Turkish Lira” is included (6698 Sayılı Kişisel Verilerin Korunması Kanunu, 2016). Personal Data Protection Authority (KVKK) is obliged to control of whether this law is implemented or not, in Turkey.

To get back to the technical aspect of the subject; there is no legal regulation regarding the use of digital monitoring technologies (Cookies) in the Turkish personal security model. Turkey has not yet taken a step in this regard (Demirel, 2012). The Law on the Protection of Personal Data No. 6698, which entered into force on 7 April 2016, came into force shortly before the adoption of the GDPR text in the European Parliament, namely by reference to Directive 95/46/EC. Therefore, KVKK has a partial compatibility with GDPR; although it is not yet reflected in the Regulation on Data Responsibles Registry published on 30 December 2017, it is inevitable that we will encounter some changes in laws and regulations in the coming period (BT Günlüğü, 2018).

2.2. Romanian Personal Data Security Model

Following the digital industry regulations in Europe, Romania has begun to shape its own personal data security model at the national level. With the adoption of the new e-Privacy Law, which has become active in 2018, replacing the European Union's General Data Protection Regulation (GDPR) and the Cookies Act, there has been a new era in the protection of Romanian data. The rights of the Internet users and the responsibilities of the data operators specified in the New General Data Protection Regulation on the digital page of the National Data Processing Authority (ANSPDCP) have been redefined. “The right to be forgotten” and “the right to data portability” are among the new rights guaranteed by the regulation. With these rights, Internet users are provided with a wide range of information. Thus, the relevant users can obtain more detailed information about the purpose of processing the personal data and storage time from the data operators. Also, as stated in the directing, a visitor in a digital environment may request that the data from the site operator be moved to another operator (ANSPDCP, 2016).

The responsibilities of the site operators are determined upon the entry into force of the new General Data Protection Regulation. These responsibilities, which are based on the transparency principle, brings the obligation of informing the users about the data process and in addition two new principles named *Privacy by design* and *Privacy by default*. When designing a data processing process, it is important to include these principles (CAFR, 2018). In the light of the GDPR principles, the data processing process involves cookies, a very important and mysterious element. Cookies are governed by the e-Privacy Directive (or 'Cookie Act'). Cookie law requires each user to give informed consent before they are stored on each user's computer or other device (Rankin, 2018). It is possible to see content that explains this subject in Romanian digital media. In an article titled 'Cookies and Romanian Law' we learned that Romania converted European Union rules into national legislation in 2004 (Tudoriu, 2012). Thus, the provisions related to cookies have been added to the Law No. 506 on the Processing of Personal Data and Privacy in the Electronic Community Sector, making it obligatory for internet owners to create cookie policies and present them to the user in a clear and accessible manner.

In the first reading, it can be said that the laws of Romania are more 'permissive' than the European directive (Tudoriu, 2012). The news that titled “Personal Data Processing Declares that the National Supervisory Agency has not Punished the GDPR Violations” (Cursdpo, 2018) in the Romanian digital channels can be shown as a proof of this. This institution with the activities that it performs “is more responsible for respecting the rights of data issues, as well as for data protection, data security and security breaches” (ANSPDCP, 2017). Although 5 months after the GDPR

application, the number of complaints sent to the relevant institution was said to be an “explosion”, but no sanctions have been imposed since 25 May 2018 (Pavel, 2018). Until the end of 2018, ANSPDCP received 5020 complaints and fined 631 500 lei (Juridice.ro, 2019). Among the main areas covered by the complaints and notifications received by the supervisor in 2018, there are the failure to comply with the conditions of consent and the legal requirements for the use of cookies.

The IAB Romania Association has published a series of recommendations for the use of cookies on websites, which support, protect and promote the development of the online advertising industry in Romania in order to raise awareness of new rules for processing personal data. In light of the suggestions, the owners of the websites need to provide enough information to their users about the concept of cookies and their role. Cookie information should also be shown and visible to users on the site. There should be a separate link with the “terms and conditions” or “privacy policy”. This connection should be easy to detect or the user should be told that this connection and cookie information is available. It is recommended that the user read this information and instructions (APTI, 2013). Recently, non-governmental organizations in Romania have complained to the Council of Europe that the National Supervisory Authority for Personal Data Processing considered the activities “inadequate”. The Association of Technology and Internet, which supports a free and open digital world, argued that the “penalties imposed on Official authorities were far below the limits set by the Regulation” (APTI, 2013), suggesting that this would further increase the GDPR violations in Romania.

2.3. Russian Personal Data Security Model

The basis of the Russian personal data security model is based on three main legal regulations. The first is the European Union General Data Protection Regulation (GDPR), which was adopted in 2016 and entered into force on 25 May 2018. This law, which aims to easily control the personal data of the European Union (EU) citizens, also aims to simplify the regulatory basis of international economic relations (Стрункина, 2018). The Russian Federal Information Technologies and Mass Communications Supervision Agency (Roskomnadzor), which has been under the influence of this law concerning the countries outside the European Union region, made necessary amendments to the Law on the Protection of Personal Data No. 152-FZ, which has been in force for 12 years in the country, as of July 1, 2017, Russian website owners have complied with EU standards.

These regulations, which brought severe penalties to the breach of the security of personal data, mobilized the entire Russian internet community. The GDPR offenses are punished by a penalty of € 20 million (Ястребова, 2018), and those who violate the 152-FZ law and will be fined up to 295,000 Russian rubles (Лагутин, 2017). This issue, which stands out in the Russian media, is one of the most debated issues in the digital media lately. The following information are in the online version of the newspaper named “Экономика и Жизнь”, which deals with the economic issues, and it says: “In Russia, for the violations of personal data protection, in addition to administrative responsibility, legal (compensation) and criminal (prison sentence) sanctions are applied. Roskomnadzor is authorized to file an administrative case for the protection of personal data. Previously such cases could only open prosecutors. Apart from this, the protection of the Personal Data Act can be blocked by Roskomnadzor with the decision of the websites of the violators” (Шестакова, 2017). According to Maksim Lagutin, consultant for the protection of personal data, the tightening of the Russian legislation depends on the tightening of the EU legislation. Roskomnadzor, which constitutes the most important risk, makes thousands of controls in a year (Лагутин, 2017). In 2017, the majority of the violations (82%) of the results of regular audits carried out by this institution are noteworthy about the lack of information on the confidentiality policy of their websites or of the processing of personal data in the related document (Лагутин, 2017). In the light of the amendments introduced by the 152-FZ law, website owners are required to take care to ensure that the user can easily access the privacy policies and that this document is placed on the

main page of the site. In addition, the relevant document should contain information on the use of analytical data (device identifier, IP address, cookie) as well as general data considered to be personal data under the law. In this regard, it is important to note that there is no definition of cookie concept in Russian legislation. Cookies are not necessarily considered as personal data, and they are not obliged to provide information about their use to internet visitors (Шестакова, 2017). However, Roskomnadzor makes sure that digital media owners give information to their users about the use of cookie files and that they receive the acceptance of users.

All these arrangements aim to raise awareness of the rights of internet users. The Russian internet user is now aware that his personal data has been collected, that the site owners have the right to obtain information about his personal data and to request the deletion of such data with his consent. This can be seen as an indication of the complaints of internet users in the annual reports of Roskomnadzor: “As a rule, citizens complain about the processing of personal data in the absence of consent from internet sources or other legal reasons, the absence of policies regarding the processing of personal data on the website, and the creation of counterfeit accounts. (Roskomnadzor, 2016)”.

3. The Importance of Comparative Privacy in the Light of Self-Determination Right

According to self-determination right, people have three basic psychological needs. These needs are called autonomy, competence and relatedness. Deci and Ryan's Self-determination Theory suggests that people have a level of psychological well-being that is based on the satisfaction of these needs. The need for autonomy expresses the chances of a person choosing his activities in his life. It means that the individual can determine his behaviors and make decisions independently. This requirement is met to the extent that the person has the chance to choose. The second need is the need for competence and is an “competency” situation that occurs as a result of people's ability to use their own capacities. It is thought that this need of the people who can overcome the works done successfully and recognizes their competency by appreciating their works is met. The third and last need is a need for commitment and refers to the feeling of being connected to people whom he is interacting. Individuals need to be belonging to one another and their loyalty will increase as people feel themselves belonging to some people or groups (Sarı & al., 2011). The use of new communication technologies has removed the boundaries between individuals and geographies, sharing and communication have gained a global dimension. In this process, individuals' use of self-determination right and their approach to digital privacy are increasingly important.

4. Material and Method

In this study, the use of digital tracking technologies (Cookies) in Turkish, Romanian and Russian Internet journalism is analyzed. However, it is a concrete framework of the study to examine the extent to which digital monitoring technologies can be used as an essential element of digital security policy with a sample of interview - “Bumerang Effect-creating Cookies” - that demonstrates the extent to which self-determination rights are advocated by Internet users.

The study focused primarily on discussing that privacy has different meanings in individuals belonging to different cultures, that the phenomenon of privacy changes according to cultures, and that digital monitoring technologies change the meaning of privacy. The literature and concept review used in the study, quantitative and qualitative research methods have made it possible to conduct an intercultural comparative evaluation of the concept of digital privacy, which interacts with internet journalism-digital tracking technologies.

4.1. Data Collection Techniques According to the Objectives of the Study

Goal 1- To make a study based on first level quantitative observations to learn whether the most read news sites of Turkey, Romania and Russia includes privacy and cookies policy, whether they use cookies or not, what kind of cookies they include and to measure the duration of the cookies.

Data Collection Technique: The most popular 10 news sites were selected and compared from each country by analyzing over 30 digital news sites in terms of privacy and cookie policy.

Goal 2- The aim of this study is to present a study which can measure the effect of Turkish, Romanian and Russian privacy on the self-determination right of internet users representing three different cultures.

Data Collection Technique: Within the scope of 'structured interview' which is one of the 'in-depth interviews' in the research, and 'interview form approach' was preferred. Since this approach is prepared as a method "with the purpose of obtaining the same kind of information from different people in order to lean on similar subjects" (Kodak, 2018), it completes the concept of the research to be made among cultures. In the interviews, the questions asked to the total 30 Turkish, Romanian and Russian participants were prepared from literature search, within the frame and subject of the study, and in the light of the themes "the need of autonomy", "the need of competency" and "the need of commitment" obtained related to self-determination right.

1. What do you usually choose from the "allow" and "prevent" options of privacy and cookie policies that you encounter during the visit of Internet news sites?
2. To what extent do you think your personal data is protected as a result of your choice?
3. What do you think about the process of processing personal data or selling it to a third party without the express consent of Internet users?
4. Are you satisfied with the information you have on digital data protection?
5. What does "if you continue to use this site, you agree to our use of cookies" mean to you?
6. Did you think you were being watched by someone or something while wandering around news sites?
7. How do you evaluate news sites in the country where you live in terms of user security?
8. How often do you re-visit internet news sites that you cannot perform secure login?
9. How do you usually behave when you notice that your privacy is not adequately protected by the privacy and cookie policy of a news site you care about?

5. Findings

Quantitative and qualitative methods used in the research can be divided into two main groups. In the first group, there are findings explaining the effect of privacy and cookie policies on individual privacy in three dimensional internet journalism. In the second group, the findings of the interview interview conducted with Turkish, Romanian and Russian participants named "Bumerang Effect-Creating Cookies" were used to measure the impact of privacy on internet users' self-determination.

5.1. The Effects of Confidentiality and Cookie Policies on Individual Privacy

Finding 1. The following table shows the fact that the most widely read 10 Turkish news sites we have reviewed in this study are "open" for the privacy and cookies policies. While 6 of 10 news sites were informed about the use of cookies, only 3 sites were reported with cookie types, of which 2 cookie times are explained. Session Cookies, Persistent Cookies, Functional and Analytical Cookies, as well as Third-party Cookies are used on sabah.com.tr, haberler.com and onedio.com news sites. The analysis of these types of cookies found that the user allowed the user to create an account, login, browse the website and get to know it when he returned. In addition, it is not possible to connect to the user's identity with the relevant cookies and no permission is required for the use of cookies. On the other side, the sites share their users' information with third parties. This situation was evaluated as an intervention to the individual privacy without the explicit consent of its users.

Table 1: Comparison Of The Use Of Cookies In Turkish News Sites

Web Site	Privacy/Cookie Policy	Use of Cookies	Cookie Types	Cookie Duration
hurriyet.com.tr	In the open	There is information	Not informed	No
milliyet.com.tr	In the open	No information	Not informed	No
haber7.com	In the open	No information	Not informed	No
sozcu.com.tr	In the open	No information	Not informed	Not explained
sabah.com.tr	In the open	There is information	Mandatory Cookies Functional Cookies Analytical Cookies	Not explained Not explained Not explained
haberler.com	In the open	There is information	Session Cookies Persistent Cookies Third-Party Cookies	Short term Long term Not explained
haberturk.com	In the open	There is information	Not informed	Not explained
onedio.com	In the open	There is information	Session Cookies Third-party Cookies	Temporary term Long term
cnnturk.com	In the open	There is information	Not informed	Not explained
gazetevatan.com	In the open	No information	Not informed	Not explained

Finding 2. Romanian news sites have been found to have a positive effect on individual privacy as a result of the use of cookies. Privacy Policy and Cookies Policies are available on separate tabs on all news sites we review. Thus, users have the opportunity to explore the legal, social and technical dimensions that play an important role in protecting their personal data. Romanian news sites, which offer a wide range of cookies, include privacy information as well as petition formats for the acceptance or refusal of personal data. The user may apply to the site operator for requesting the deletion of his personal data, deletion or transfer to another person.

Table 2: Comparison Of The Use Of Cookies In Romanian News Sites

Web Site	Privacy/Cookie Policy	Use of Cookies	Cookie Types	Cookie Duration
dnews.ro	In the open	There is information	Performance Cookies Analytical Cookies Registration Cookies Advertisement Cookies Geotargetting Cookies	Not explained Not explained Not explained Not explained Not explained
ziare.com	In the open	There is information	First-party Cookies Third-party Cookies	1 day - 26 years 30 minutes - 23 years
sfatulmedicului.ro	In the open	There is information	Cookie modules are not explained	Short term
antena3.ro	In the open	There is information	Google Analytics Targetting Cookies	Not explained Not explained
divahair.ro	In the open	There is information	Mandatory Cookies Performance Cookies Geotargetting Cookies Advertisement Cookies Analytics Cookies	Not explained 10 minutes - 2 years Not explained 2 years Not explained
evz.ro	In the open	There is information	Mandatory Cookies Performance Cookies Statistics Cookies Marketing Cookies	1 day - 2013 days 1 day - 8 months 1 day - 60 years 1 day - 68 years
cotidianul.ro	In the open	There is information	Not explained	Not explained
jurnalul.ro	In the open	There is information	Not explained	Not explained
adevarul.ro	In the open	There is information	Session Cookies Statistics Cookies	Temporary term An indefinite term
romanioliberal.ro	In the open	There is information	Performance Cookies Analytics Cookies Geotargetting Cookies Registration Cookies Advertisement Cookies	Not explained Not explained Not explained Not explained Not explained

Finding 3. Access to Russian news sites' privacy and cookie policies is only available to registered users. Any user interested in the privacy policies of these sites cannot usually find the information "in the open". Only 3 of the 10 most popular sites representing the Russian Online media explain the user's privacy policy on the main page. While newsru.com, iz.ru, and vedomosti.ru, which we have reviewed, are partially informed about the use of cookies in the privacy policy of news sites, we have found that there is no information about the type and duration of cookies. In the news sites that do not contain the privacy policy, it is possible to reach the pdf format of the related documents. These documents are presented to the user under the terms of "Allowing Personal Data Processing"

or “Site Terms of Use and Privacy”. Usually, these documents mention the contract signed between site operators and site users. Although their legal rights and responsibilities are voiced, it is not possible to come across any information about the collection of personal data in their privacy policies. These sites prefer the phrases of “The use of the information that is kept by the browser” or “Unique identifier of the user access to the internet sources” (www.lenta.ru) instead of ‘Cookies’. In addition, some of the news sites that we have examined have determined that they use “TOP-100 Statistics System” to collect personal data.

Table 3: Comparison Of The Use Of Cookies In Russian News Sites

Web Site	Privacy/Cookie Policy	Use of Cookies	Cookie Types	Cookie Duration
gazeta.ru	Not in the open	No information	No	No
rbc.ru	Not in the open	No information	No	No
ria.ru	Not in the open	No information	No	No
kp.ru	Not in the open	No information	No	No
rg.ru	Not in the open	No information	No	No
newsru.com	In the open	There is information	Not explained	Not explained
lenta.ru	Not in the open	No information	No	No
iz.ru	In the open	There is information	Not explained	Not explained
aif.ru	Not in the open	No information	No	No
vedomosti.ru	In the open	There is information	Not explained	Not explained

5.2. “Bumerang Effect-Creating Cookies” Self-Determination Rights

Finding 1: Turkish Example

Answers to the questions that put the need for autonomy: The Turkish participants stated that they chose the “prevent” in the “What do you usually choose from the “allow” and “prevent” options of privacy and cookie policies that you encounter during the visit of Internet news sites?” question and stated that they did not think that the personal data were protected as a result of their selection. All participants used expressions such as “crime”, “trust damaging”, “unlawful” and “unethical behavior” in the “What do you think about the process of processing personal data or selling it to a third party without the express consent of Internet users?” question without the consent of the person.

Answers to the questions that put the need for competency: Turkish participants stated that they were mostly dissatisfied with the level of knowledge in the “Are you satisfied with the information you have on digital data protection?” question. People interviewed in the “What does “if you continue to use this site, you agree to our use of cookies” mean to you?” question reported a negative opinion regarding the use of cookies. Four participants stated that they were forced to make a choice and that internet users had to leave the relevant sites as a result of this process. Another participant used the following statement: “Obviously I am closing the sites I see this message as long as I don’t have to. In fact, I am deleting the information of the sites I have used in the past in the internet settings. Such sites do not give me any confidence”. In the “Did you think you were being watched by someone or something while wandering around news sites?” question, three of the Turkish participants stated that they did not think that they were being followed. Seven participants stated that they were aware of being observed in the same question.

Answers to the questions that put the need for commitment: In the “How do you evaluate news sites in the country where you live in terms of user security?” question, the participants shared their opinions that the security of the users was moderate. One person said that the security of internet users is weak, and two people have used the words “I have no idea”. In the “How often do you re-

visit internet news sites that you cannot perform secure login?" question, the Turkish participants answered that they did not visit unless they had to. One person said that the entry to the sites continues. The answers given by the participants to the "How do you usually behave when you notice that your privacy is not adequately protected by the privacy and cookie policy of a news site you care about?" question are that they need to be cleared from their internet settings after using the site. They think that they should not be allowed to access these sites. Two participants shared the opinion of reporting the situation to the owner of the site.

Finding 2: Romanian Example

Answers to the questions that put the need for autonomy: Half of the interview participants stated that they had "prevent" the option, while the other half stated that they "allow" in the "What do you usually choose from the "allow" and "prevent" options of privacy and cookie policies that you encounter during the visit of Internet news sites?" question. In the "To what extent do you think your personal data is protected as a result of your choice?" question, all participants (except two people) underlined that personal data is not protected. In the "What do you think about the process of processing personal data or selling it to a third party without the express consent of Internet users?" question, the Romanian participants announced that this behavior was unacceptable. One participant's statement is: "I am absolutely against such practices. I find it unacceptable that some content providers are pushing the user's consent. This conditioning is preventing the internet user from navigating to the site in whole or in part. And the information in the site is reached only by the acceptance of cookies".

Answers to the questions that put the need for competency: Half of those who answered "Are you satisfied with the information you have on digital data protection?" question said "Yes", half said "No". People understand the "If you continue to use this site, you agree to our use of cookies" statement as follows: "If I want to access the information on the site, I have to accept cookie policies". Two people have difficulty in answering what this sentence means. While wandering around news sites, Romanian participants who understand that someone, someones or something are following them, have mostly answered "Yes" to our questions. Two people stated that they did not think that they were being watched.

Answers to the questions that put the need for commitment: Romanian users answered that the question of "How do you evaluate news sites in the country where you live in terms of user security?" is not possible to talk about the privacy of the users of the websites in digital media or the protection of personal data. Three of the relevant users evaluated the safety as "Satisfactory". Another participant answered the question as follows: "I think every news site can identify its users". Romanians said that they visited these websites frequently or every day on the internet news sites where they did not login safely. One person "Rarely", two people, "I do not re-enter these sites" have used these phrases. Romanian users have often responded negatively to the "How do you usually behave when you notice that your privacy is not adequately protected by the privacy and cookie policy of a news site you care about?" question. One person used a very descriptive statement: "It is not possible to notice this situation once, because many providers show their privacy and an example message that personal data is protected. Therefore, users can not react to this fraud".

Finding 3: Russian Example

Answers to the questions that put the need for autonomy: In the "What do you usually choose from the "allow" and "prevent" options of privacy and cookie policies that you encounter during the visit of Internet news sites?" question, all Russian users prefer to "prevent", and they believe that personal data is not protected. Participants in the "What do you think about the process of processing personal data or selling it to a third party without the express consent of Internet users?" question made the following recommendation: "I see personal data as a plus for both the user and the company

if it is not shared with the third party. In this way, both the user's confidence increases and the company gains more revenue with the information they have acquired”.

Answers to the questions that put the need for competency: Five of the Russian participants stated in the “Are you satisfied with the information you have on digital data protection?” question that they were not satisfied with the level of knowledge they had about the protection of personal data in digital channels. Four people responded positively to the question. One participant said that the level of knowledge about the protection of privacy is at the intermediate level. When they visited the news sites, the Russian participants made the “If you continue to use this site, you agree to our use of cookies” statement as “Logging in to the site in exchange for personal data”. A participant expressed his understanding as follows: “Even if you read or not, you must accept this policy. So if I want to use this site, I have to accept the terms of use of the site”. Russians mostly give “No” answer to the question “Did you think you were being watched by someone or something while wandering around news sites?”

Answers to the questions that put the need for commitment: The answer to the “How do you evaluate news sites in the country where you live in terms of user security?” question is the diversity of Russian participants: “As in many countries, news sites are not safe in my country in terms of personal data protection, I think. The user is not asked anything”. Another participant stated his opinion as; “I think it's a good thing to create my personal profile and give news and ads that will interest me. If this work is done without permission, it is very disturbing”. One person said that news sites in the country where they live are moderately safe, while another participant used the term 'low'. Some participants' answers to the same question have been different: “I do not use news sites. I prefer TV news”, “I do not trust news sites”, “A little good”. The Russian participants said that they did not prefer to re-visit the internet news sites that they did not make secure. The violations in question, the owners of the site reported that they apply after the legal ways.

6. Discussion

Privacy and the cookie policies in internet journalism create different effects on the individual privacy. While half of Turkish news sites do not share full information on the use of cookies, they are presented to their users in a whole and complete manner by assigning a clear place to cookie policies in Romanian digital news sources. Russian news sites that develop a unique style share their privacy policies with generally registered users and do not provide cookies explaining information. Based on the data obtained from the study, it was determined that Turkish, Romanian and Russian internet users benefited from these policies as much as they had the right to self-determination. In line with the, autonomy, competency and commitment needs that explains self-determination, the differences in the culture of information security of users have been revealed. Although the Turkish digital privacy model we have created has the choice of protecting the personal data, the need for autonomy is not met. An “inadequacy” situation that arises in the management of the cookie adds a negative connotation to the competency requirement of the Turks. There was no commitment to the news sites visited by Turks. In the Romanian digital privacy model, it has been observed that the protection of personal data is a very important issue, so users are insisting on meeting the need for autonomy. The competency need of Romanian users who are aware of the functions of cookie technology used in news sites can be considered as “conscious”. Their interest in news sites explains Romanian’s need for commitment: “often” or “every day”. In the Russian digital privacy model, it was observed that the users of the news site had a significant share in meeting the need for autonomy. Although they are mostly dissatisfied with the information they have about the protection of personal data in the digital environment, they are interested in monitoring technologies such as cookies to meet their competence needs. Also, it was observed that Russians did not have any commitment dimension to the news sites they visited. As a result, we can say that the users of internet journalism, which is developing in company with this monitoring technologies

-cookies-, are in a search of a new security model that reveals the limits by hiding behind the transnational privacy understanding in the digital transformation that they are in.

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