TURKISH COMPETITION BOARD ACCEPTS COMMITMENTS FROM VISA APPOINTMENT SERVICES PROVIDER

In a preliminary investigation decision dated 26 February 2026, the Turkish Competition Board (the "**Board**") accepted and rendered binding a set of commitments offered by VF Vize Danışmanlık Hizmetleri Ticaret Limited Şirketi ("**VF Vize**") to address competition concerns arising from preferential access to visa appointments granted to Camelot Air Travel Turizm ve Ticaret Anonim Şirketi ("**Camelot**"), a travel agency affiliated with VF Vize's subcontractor, Gateway Management Lojistik Anonim Şirketi ("**Gateway**").[1]

The Board found that certain practices implemented jointly by VF Vize and Gateway may have enabled Camelot to secure visa appointments more easily than competing travel agencies, potentially restricting competition in the market for visa consultancy services. In light of the commitments offered, the Board decided not to open a full investigation against VF Vize.

1. Background and the Board's Findings

The preliminary investigation followed a complaint filed by the Association of Turkish Travel Agencies (TÜRSAB), alleging that VF Vize, Gateway, and Camelot had engaged in practices that excluded travel agencies from the market and impeded market entry.

VF Vize operates visa application centers on behalf of diplomatic missions and serves as the main contractor for a significant number of countries in Türkiye. Gateway acts as VF Vize's subcontractor, providing personnel and operational management support. Camelot, meanwhile, is a travel agency offering visa consultancy services that belongs to the same economic unit as Gateway. Unlike VF Vize, which does not itself provide visa consultancy services, Camelot therefore competes directly with other travel agencies for customers seeking assistance with visa applications.

Evidence gathered during the on-site inspections indicated that Camelot received preferential treatment in accessing visa appointments. In particular, the Board identified the following practices:

- the reservation of appointment quotas for Camelot,
- the creation of appointments for specific Camelot customers upon request, including on earlier dates or where appointments were otherwise unavailable, and
- the provision of priority treatment to Camelot customers at VF Vize's visa application centers.

The evidence also included internal communications referencing concerns raised by diplomatic missions. One such communication, concerning the Dutch Ministry of Foreign Affairs, referred to concerns that Camelot had been informed in advance of when appointment slots would be released, allowing it to book those slots immediately for its customers.

1 The Board's decision dated 26 February 2026 and numbered 26-07/217-78.

The Board concluded that these practices could enable Camelot to obtain appointments more easily than competing travel agencies. Because access to visa appointments is an essential input for visa consultancy firms, agencies unable to secure appointments for their customers could face material difficulties conducting business. On this basis, the Board identified a potential restriction of competition in the visa consultancy services market.

2. Assessment Under Article 4 of the Competition Law

VF Vize was responsible for the overall management of the visa application centers, while Gateway provided operational support in its capacity as subcontractor. The evidence reviewed by the Board indicated that VF Vize was aware of the practices favoring Camelot. The Board also pointed to the contractual relationship between VF Vize and Gateway, including an arrangement under which VF Vize received payment for each application processed in connection with certain Camelot visa concierge services. On this basis, the Board found that the preferential treatment afforded to Camelot resulted from the common will of VF Vize and Gateway.

Accordingly, the Board characterized the allocation of a special quota to Camelot, the creation of appointments for designated Camelot customers and the prioritization of Camelot customers at visa application centers as coordinated conduct under Article 4 of Law No. 4054 on the Protection of Competition (the "Competition Law"). The Board therefore considered it unnecessary to separately examine VF Vize's conduct as a potential abuse of dominance (i.e., unilateral conduct) under Article 6 of the Competition Law.

The Board accepted the commitments offered by the parties at the preliminary investigation stage, bringing the proceedings to a close without a full-fledged investigation.

3. Commitments Offered by VF Vize and Accepted by the Board

VF Vize offered two sets of commitments aimed at preventing discriminatory access to visa appointments and strengthening the security of its appointment systems.

- First, VF Vize committed not to grant preferential or special treatment to any travel agency providing visa consultancy services, including in relation to appointment scheduling.
- Appointment management will be centralized through a Central Appointment Management System, Gateway's administrator access to the appointment system will be restricted, and Gateway personnel will only have limited access to reports concerning customers with scheduled appointments. Appointment quotas will be managed exclusively by authorized VF Vize personnel.
- Second, VF Vize committed to strengthen the security of its appointment system to ensure secure, transparent and non-discriminatory access, and to prevent bot accounts from misusing the visa appointment system.

In addition to measures already in place (including restrictions on suspicious email domains and IP addresses, limits on appointments per email address, VPN restrictions, waiting lists, foreign credit card restrictions and enhanced OTP authentication) VF Vize committed to introduce additional API rate-limiting measures designed to curb abusive, automated attempts to secure appointments. VF Vize further committed to engage third-party technical solution providers and to establish a dedicated internal team to identify and address potential vulnerabilities.

The Board considered these commitments proportionate, suitable and sufficient to address the competition concerns identified during the preliminary investigation, and accordingly rendered them binding on VF Vize while deciding not to open an investigation.

4. Conclusion

The decision is notable for the Board's treatment of preferential access to a scarce input, in this case, visa appointment capacity, as a potential competition concern. The Board found that these practices reflected the common will of VF Vize and Gateway and accordingly examined them under Article 4 rather than pursuing a separate abuse-of-dominance theory under Article 6.

In a separate decision adopted on the same day, the Board also accepted commitments from

Gateway and Camelot arising from the same preliminary investigation.[2] Those commitments mainly addressed the structural link underlying the concerns: Camelot committed to cease providing visa consultancy services within 30 days, while Gateway committed that no company within its economic unit would provide visa consultancy services in Türkiye through any travel agency, and that it would not discriminate in favor of any travel agency in relation to visa appointments.

Camelot also undertook to remove visa consultancy content from its communication channels, and both companies committed to appoint competition compliance officers. The Board considered these measures sufficient to prevent a recurrence of the identified practices and closed the preliminary investigation with respect to Gateway and Camelot as well.

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[2] The Board's decision dated 26 February 2026 and numbered 26-07/216-77