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## CONSUMER AS VULNERABLE SUBJECT OF LAW: INTERNATIONAL STANDARDS AND TURKISH MODEL OF LEGAL PROTECTION

### *Abstract*

The article considers the legal status of the consumer as a vulnerable subject of law in the context of globalization, digitalization of the economy and the transformation of modern consumer markets. It is justified that the traditional principle of formal equality of parties to contractual relations does not reflect the actual socio-economic and information inequality between the consumer and professional market participants. As a result, the consumer objectively needs enhanced legal guarantees and special protection mechanisms that go beyond the scope of classical private law regulation.

Based on theoretical and comparative analysis, the article examines international consumer protection standards formed within the framework of the United Nations, the European Union and the Organization for Economic Cooperation and Development. It is shown that these standards are consistently developing in the direction of recognizing consumer vulnerability and strengthening public legal and preventive protection tools aimed at reducing information asymmetry, preventing unfair commercial practices and ensuring the real availability of legal protection.

Particular attention is paid to the analysis of the Turkish model of legal protection of consumers, which is largely harmonized with international and European approaches, but remains predominantly reactive. The article emphasizes that digitalization and the development of the platform economy increase consumer vulnerability, which is confirmed by empirical data from international organizations and official statistics from Turkey, indicating an increase in the number of consumer complaints in the digital sector.

The study justifies the conclusion that it is necessary to normatively consolidate the concept of consumer vulnerability in national law and develop a comprehensive system of preventive protection based on international best practices and focused on balancing the interests of participants in consumer relations.

**Key words:** consumer rights, vulnerable legal entity, international standards, digital economy, consumer protection.

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## ТҰТЫНУШЫ ҚҰҚЫҚТЫҢ ОСАЛ СУБЪЕКТІСІ РЕТІНДЕ: ХАЛЫҚАРАЛЫҚ СТАНДАРТТАР ЖӘНЕ ҚҰҚЫҚТЫҚ ҚОРҒАУДЫҢ ТҮРІК МОДЕЛІ

### Аңдатпа

Мақалада жаһандану үдерістері, экономиканы цифрландыру және қазіргі тұтыну нарықтарының институционалдық трансформациясы жағдайында тұтынушының құқықтың осал субъектісі ретіндегі құқықтық мәртебесі жан-жақты талданады. Шарттық қатынастар субъектілерінің формальды теңдігі қағидаты тұтынушы мен кәсіпкерлік қызметті кәсіби негізде жүзеге асыратын нарық қатысушылары арасындағы объективті әлеуметтік-экономикалық және ақпараттық асимметрияны толық көлемде ескере бермейтіні дәлелденеді. Осыған байланысты тұтынушының құқықтары мен заңды мүдделерін тиімді қорғауды қамтамасыз ету мақсатында классикалық жеке-құқықтық реттеу шеңберінен тыс күшейтілген құқықтық кепілдіктер мен арнайы құқықтық тетіктерді қалыптастырудың объективті қажеттілігі негізделеді.

Теориялық-құқықтық және салыстырмалы-құқықтық талдау негізінде мақалада Біріккен Ұлттар Ұйымы, Еуропалық одақ және Экономикалық ынтымақтастық пен даму ұйымы шеңберінде қалыптасқан тұтынушылардың құқықтарын қорғаудың халықаралық стандарттары зерттеледі. Аталған стандарттардың тұтынушының осал субъект ретіндегі мәртебесін тану бағыты бойынша жүйелі түрде дамып келе жатқаны, сондай-ақ ақпараттық асимметрияны төмендетуге, жосықсыз коммерциялық практикалардың алдын алуға және құқықтық қорғаудың нақты қолжетімділігін қамтамасыз етуге бағытталған жария-құқықтық және превентивтік қорғау құралдарын күшейту үрдісі айқындалады.

Тұтынушылардың құқықтарын қорғаудың түрік моделін талдауға ерекше назар аударылады, бұл халықаралық және еуропалық тәсілдермен едәуір дәрежеде үйлестірілгенімен, негізінен реактивті сипатта қалып отыр. Мақалада цифрландыру және платформалық экономиканың дамуы тұтынушылардың осалдығын күшейтетін факторлар ретінде айқындалып, бұл жағдай халықаралық ұйымдардың эмпирикалық деректерімен және Түркияның ресми статистикалық мәліметтерімен расталады, олар цифрлық сектордағы тұтынушылық шағымдар санының өсу үрдісін көрсетеді.

Зерттеу тұтынушының осалдығы тұжырымдамасын ұлттық құқықта нормативтік тұрғыдан бекіту және халықаралық үздік тәжірибелерге негізделген, тұтынушылық қатынастарға қатысушылардың мүдделер теңгерімін қамтамасыз етуге бағытталған кешенді превентивтік қорғау жүйесін дамыту қажеттігі туралы қорытындыны негіздейді.

**Түйін сөздер:** тұтынушылардың құқықтары, құқықтың осал субъектісі, халықаралық стандарттар, цифрлық экономика, тұтынушылардың құқықтарын қорғау.

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## ПОТРЕБИТЕЛЬ КАК УЯЗВИМЫЙ СУБЪЕКТ ПРАВА: МЕЖДУНАРОДНЫЕ СТАНДАРТЫ И ТУРЕЦКАЯ МОДЕЛЬ ПРАВОВОЙ ЗАЩИТЫ

### Аннотация

В статье рассматривается правовой статус потребителя как уязвимого субъекта права в условиях глобализации, цифровизации экономики и трансформации современных потребительских рынков. Обосновывается, что традиционный принцип формального равенства сторон договорных отношений не отражает фактического социально-экономического и

информационного неравенства между потребителем и профессиональными участниками рынка. В результате потребитель объективно нуждается в усиленных правовых гарантиях и специальных механизмах защиты, выходящих за рамки классического частноправового регулирования.

На основе теоретико-правового и сравнительно-правового анализа в статье исследуются международные стандарты защиты прав потребителей, сформированные в рамках Организации Объединённых Наций, Европейского союза и Организации экономического сотрудничества и развития. Показано, что данные стандарты последовательно развиваются в направлении признания уязвимости потребителя и усиления публично-правовых и превентивных инструментов защиты, направленных на снижение информационной асимметрии, предупреждение недобросовестных коммерческих практик и обеспечение реальной доступности правовой защиты.

Особое внимание уделяется анализу турецкой модели правовой защиты потребителей, которая в значительной степени гармонизирована с международными и европейскими подходами, однако сохраняет преимущественно реактивный характер. В статье подчёркивается, что цифровизация и развитие платформенной экономики усиливают уязвимость потребителей, что подтверждается эмпирическими данными международных организаций и официальной статистикой Турции, свидетельствующими о росте числа потребительских жалоб в цифровом секторе.

Исследование обосновывает вывод о необходимости нормативного закрепления концепции уязвимости потребителя в национальном праве и развития комплексной системы превентивной защиты, основанной на лучших международных практиках и ориентированной на обеспечение баланса интересов участников потребительских отношений.

**Ключевые слова:** права потребителей, уязвимый субъект права, международные стандарты, цифровая экономика, защита прав потребителей.

### *Introduction*

In the context of the globalization of the economy, the digitalization of trade processes and the complication of trade turnover, the legal status of the consumer are undergoing significant changes. Modern consumer relations are characterized by a stable asymmetry between professional market participants and the end consumer, which is manifested in inequality of economic opportunities, information imbalance, as well as in the limited ability of the consumer to influence the content of contractual terms. In this regard, the category "vulnerable subject of law" is increasingly used in legal science, applied to the consumer as a party in need of special legal guarantees and enhanced protection from the state.

The problem of consumer vulnerability is not only private law, but also public law. The traditional principle of formal equality of the parties to a civil law contract is largely losing its regulatory effectiveness in the field of mass consumer relations. Standardized contracts, digital platforms, cross-border trade and e-commerce increase the consumer's dependence on a professional seller or service provider, which objectively requires a revision of classical doctrinal approaches to protecting his rights.

The relevance of the study is due to the fact that the recognition of the consumer as a vulnerable subject of law has become a key direction in the development of international standards for the protection of human and economic rights. The UN Guidelines on Consumer Protection, European Union legal acts, as well as analytical documents of the Organization for Economic Cooperation and Development form an integrated approach aimed not only at formally securing consumer rights, but also at ensuring their real feasibility [1; 2]. Foreign scientific literature indicates that the concept of vulnerability justifies the use of special regulatory and institutional mechanisms aimed at restoring the balance of interests of the parties to consumer relations [3, p. 27-30].

Of particular scientific interest in this context is the Turkish model of consumer legal protection. Turkey, possessing a dynamically developing domestic market and actively participating in international trade, is consistently modernizing national legislation in the field of consumer protection, taking into account international standards and, above all, the legal approaches of the European Union.

In Turkish legal doctrine, consumer protection issues have traditionally been considered mainly within the framework of private law, however, in recent years, attention to their constitutional-legal and socio-legal dimension has been increasing [4, p. 64-66]. At the same time, a comprehensive analysis of the consumer as a vulnerable subject of law in the Turkish protection model, correlated with international standards, remains underdeveloped.

In scientific studies of foreign and Turkish authors, certain aspects of the legal status of the consumer, mechanisms of judicial and administrative protection, as well as the impact of digitalization on consumer relations are considered [5; 6]. However, most of the works are fragmented and do not fully reveal the systemic features of the legal structure of the consumer's vulnerability and its normative consolidation.

The purpose of this article is a theoretical-legal and comparative-legal analysis of the consumer as a vulnerable subject of law based on international standards and the Turkish model of legal protection. To achieve this goal, the article proposes: to disclose the legal nature of the consumer's vulnerability; analyze key international standards in the field of consumer protection; to investigate the peculiarities of the Turkish model of legal protection; identify directions for its further development in a globalizing market.

#### *Materials and methods*

The methodological basis of this study is general scientific and special legal methods of knowledge, the use of which is due to the complex and interdisciplinary nature of consumer protection issues. Within the framework of the study, the consumer is considered as a vulnerable subject of law, which requires a combination of legal theory, comparative law and normative dogmatic approaches.

As the main method, a formal legal analysis was used, which made it possible to identify the content and structure of the legal status of the consumer, as well as to determine the specifics of the normative consolidation of the mechanisms of its protection in international and national legal acts. This method was used in the study of international consumer protection standards, including United Nations guidelines, European Union legal acts and documents of the Organization for Economic Cooperation and Development, as well as in the analysis of Turkish consumer protection legislation.

The comparative legal method is used to compare international standards and the Turkish model of legal protection of consumers. Through this method, similarities and differences in approaches to recognizing the consumer as a vulnerable subject of law, as well as features of institutional and procedural protection mechanisms, were identified. The comparative analysis made it possible to determine the degree of implementation of international standards into Turkish national legislation and assess their practical effectiveness.

The theoretical and legal method was used to comprehend the concept of consumer vulnerability in the context of the evolution of the legal regulation of consumer relations. Within the framework of this approach, the provisions of the doctrine of private and public law, the theory of the social state and the concept of protecting the economically weak side of legal relations were used. This made it possible to justify the need to move away from the formal equality of the parties to the contract in the field of consumer relations and strengthen public legal guarantees.

The empirical base of the study includes analytical and statistical data from international organizations, including the Organization for Economic Cooperation and Development, the European Commission (Consumer Scoreboard), as well as official statistical materials from the Turkish Statistical Institute. The use of empirical data is aimed at illustrating the practical aspects of consumer vulnerability and assessing the effectiveness of existing legal protection mechanisms.

The work used methods of systemic analysis and logical and legal generalization, which made it possible to consider consumer protection as an integral legal system, including regulatory, institutional and procedural elements. The totality of the methods used ensured the comprehensive nature of the study and made it possible to formulate reasonable conclusions about the state and prospects of the development of the Turkish model of legal protection of consumers in the context of international standards.

### *Results and discussion*

The results of the study allow us to state that in modern law, consumer protection loses its exclusively private law character and is transformed into a comprehensive system of public-private regulation. The key result of the analysis is confirmation that the consumer, in the context of the global market, digitalization and standardization of contractual conditions, objectively acts as a vulnerable legal entity in need of special legal guarantees and institutional support. This conclusion is consistent with the doctrinal position on the social function of consumer law, which implies the admissibility of redistributive mechanisms and strengthened guarantees in favor of the economically weak side of the contract [7].

International consumer protection standards show a steady trend towards institutionalizing the concept of vulnerability. The United Nations Consumer Protection Guidelines form a universal regulatory framework that recognizes the structural inequality between the consumer and the professional market participant. A significant result of the analysis of these principles is the conclusion that they proceed from the need for an active role of the state in ensuring a balance of interests, including monitoring the quality of goods and services, preventing unfair commercial practices and guaranteeing access to effective remedies [1].

In European Union law, the concept of vulnerability has received the most extensive normative and institutional expression. EU directives on consumer rights, unfair contractual terms and unfair commercial practices form a multi-level protection system focused not only on the restoration of violated rights, but also on their preventive protection [9; 10]. The European protection model proceeds from the refusal to absolutize the principle of formal equality of the parties to the contract and enshrines the special obligations of a professional market participant in relation to the consumer. The doctrine rightly emphasizes that the recognition of the consumer as a vulnerable subject of law serves as a legitimate basis for expanding administrative supervision and strengthening public legal regulatory mechanisms [5, p. 118-121; 7].

The analysis of documents of the Organization for Economic Cooperation and Development, reflecting the impact of the digital economy on consumer vulnerability, deserves special attention. OECD reports record an increase in risks associated with the use of electronic platforms, algorithmic pricing and processing of personal data. Empirical evidence suggests that the digital environment increases information asymmetry, reduces the consumer's ability to rationally assess contractual conditions and increases the likelihood of violation of his rights [2]. These findings are confirmed by the materials of the Consumer Conditions Scoreboard of the European Commission, which established a stable correlation between the level of digital literacy of consumers and the effectiveness of their rights [3]. Specialized studies on EU law and the digital economy emphasize that digital interfaces, "dark patterns", personalized offers and opaque ranking models can increase consumer vulnerability and require the adaptation of classic security tools to the platform environment [8].

Analysis of the Turkish model of consumer legal protection shows that national legislation is largely harmonized with international and European standards. The Turkish Consumer Protection Law provides for a wide range of material and procedural guarantees, including expanded information duties of the seller, the right of the consumer to withdraw from the contract, as well as special procedures for dealing with consumer disputes. At the same time, the results of comparative legal analysis indicate that the recognition of the consumer as a vulnerable subject of law in Turkish law is predominantly functional in nature and is not always accompanied by direct normative consolidation of this concept [6, p. 92-95]. From the standpoint of a socio-legal approach, this means that the regulatory architecture of protection can remain "reactive" (after violation), while the vulnerability-oriented model also involves "proactive" measures - preventing unfair conditions, reducing barriers to access to protection and strengthening supervision [7].

Empirical data from the Turkish Ministry of Trade and the Turkish Statistical Institute confirm the existence of systemic problems in the field of consumer protection. In the context of the active development of e-commerce, there is a steady increase in the number of consumer complaints, while their largest share is associated with remote contracts, the quality of digital services and violation of information provision obligations [13; 14]. This allows us to conclude that the formal presence of rights does not guarantee their effective implementation and that the digitalization of the market objectively increases the vulnerability of the consumer. Against this background, those instruments that are

considered in EU law as a response to digital vulnerability are of particular importance: enhanced information standards, control of platform practices and available digital complaint channels [8].

The analysis reveals a number of structural limitations of the Turkish consumer protection model. These include fragmented institutional regulation, limited alternative dispute resolution options, and insufficient legal awareness. The scientific literature emphasizes that the effectiveness of protecting the rights of vulnerable subjects is determined not only by the volume of regulatory guarantees, but also by the availability of procedures for their implementation, as well as the degree of trust in state institutions [4, p. 59-62]. The social law perspective (consumer law as social justice) further emphasizes that consumer protection should take into account the heterogeneity of consumer groups and differences in the level of resources, competencies and digital literacy, since they form the actual vulnerability [7].

Comparative legal analysis shows that the convergence of the Turkish model with international standards requires an integrated approach, including legislative, institutional and educational measures. This conclusion is supported by OECD empirical data, according to which the level of consumer confidence in the market directly correlates with the effectiveness of administrative supervision and the presence of available mechanisms for alternative dispute resolution [2]. In countries where the concept of consumer vulnerability is reflected in legislation and institutional practice, higher rates of satisfaction with protection of rights and lower levels of repeated violations are recorded.

The materials of the Consumer Conditions Scoreboard of the European Commission further confirm that the presence of simplified complaint procedures, digital protection tools and active state supervision significantly increases the actual realizability of consumer rights, especially for socially and economically vulnerable groups of the population [3]. Similar trends are observed in Turkey, where an increase in the number of complaints in the digital sector requires strengthening preventive protection tools and expanding available response channels comparable to the best practices formed in EU law for the digital economy [8].

Similar trends can be seen in Turkey, where an increase in complaints in the digital sector reflects structural changes in consumer relations and increases consumer vulnerability in a platform economy. A feature of the Turkish context is the high dynamics of the development of e-commerce, accompanied by the rapid involvement of wide sections of the population in digital forms of consumption with a relatively uneven level of digital and legal literacy. This creates a situation in which the formal expansion of market access is not accompanied by an adequate strengthening of the consumer's ability to effectively defend his rights.

Empirical data from the Turkish Ministry of Trade indicate that the largest increase in consumer complaints falls on the segments of remote contracts, online marketplaces and digital services, including subscription models and electronic mediation platforms [13]. A significant part of the appeals is associated with a violation of the information duties of sellers, opaque terms of refusal of the contract, as well as problems of returning funds. These factors indicate that the digital environment increases the asymmetry of information and reduces the real ability of the consumer to assess the legal consequences of his actions, which is consistent with the findings of comparative studies on EU law [8].

The specifics of the development of these trends in Turkey also lie in the institutional architecture of consumer protection. Despite the presence of specialized bodies and procedures for dealing with consumer disputes, the protection system is largely focused on reactive mechanisms involving intervention after the occurrence of a violation. At the same time, preventive tools aimed at preventing unfair digital practices are at the stage of formation and do not always have sufficient regulatory power. This distinguishes the Turkish model from EU law and order, where the emphasis is shifted towards early identification of risks and administrative supervision of digital commercial practices [9; 10].

An additional factor of consumer vulnerability in Turkey is the high concentration of digital markets and the dominance of large online platforms, which objectively limits the ability of the individual consumer to influence the terms of service. In the absence of developed collective protection mechanisms and effective collective claim instruments, this increases the consumer's dependence on platform operators and reduces the preventive potential of legal regulation. The scientific literature emphasizes that it is in the conditions of the platform economy that the recognition of the consumer as a vulnerable subject of law should serve as the basis for expanding public law intervention and strengthening the supervisory functions of the state [7].

At the same time, it should be noted that Turkish legislation demonstrates a progressive movement towards rapprochement with the best European practices. Digital complaint channels are being developed, electronic systems for monitoring consumer complaints are being introduced, and attempts are being made to adapt regulatory requirements to the specifics of e-commerce. However, these measures are predominantly fragmented and do not yet form a holistic preventive model for protecting vulnerable consumers, comparable to the systemic approach enshrined in the law of the European Union for the digital economy [8; 11].

Thus, the development of digital consumer relations in Turkey is accompanied by a deepening of consumer vulnerability, which is manifested in an increase in complaints, increased information asymmetry and limited effectiveness of preventive protection mechanisms. This confirms the conclusion that it is necessary to further evolve the Turkish model of consumer protection towards normative consolidation of the concept of vulnerability, expanding administrative supervision of digital practices and borrowing systemic solutions developed in EU law.

The inclusion of empirical evidence in the discussion of the results leads to the conclusion that the recognition of the consumer as a vulnerable subject of law is not only theoretical, but also practical. The effectiveness of consumer protection is determined by a combination of regulatory safeguards, institutional mechanisms and legal awareness. The results obtained confirm that the recognition of consumer vulnerability does not limit market freedom, but, on the contrary, contributes to the formation of fair, transparent and predictable economic relations [7].

### *Conclusion*

The study made it possible to justify that in the context of globalization, digitalization of the economy and the transformation of consumer markets, the legal status of the consumer is undergoing significant changes. The consumer increasingly acts not as a formally equal party to contractual relations, but as a vulnerable legal entity in need of special regulatory and institutional guarantees. This conclusion is confirmed both by the development of international consumer protection standards and the evolution of national legal order, including the Turkish legal system.

An analysis of international standards showed that in documents of the United Nations, the European Union and the Organization for Economic Cooperation and Development, the concept of consumer vulnerability serves as a theoretical and regulatory basis for moving away from the principle of formal equality of parties and for strengthening public legal regulatory mechanisms. International practice demonstrates a shift in focus from reactive protection of violated rights to preventive measures aimed at preventing unfair commercial practices, reducing information asymmetry and ensuring the real availability of legal protection.

Comparative legal analysis revealed that the Turkish model of legal protection of consumers is largely harmonized with international and European standards and contains a developed set of material and procedural guarantees. At the same time, it was established that the recognition of the consumer as a vulnerable subject of law in Turkish law is mainly of an implicit and functional nature. This limits the potential for preventive regulation and reduces the effectiveness of consumer protection, especially in the digital economy and platform markets.

The inclusion of empirical data in the analysis confirmed that the rise in consumer complaints, particularly in e-commerce and digital services, is an objective indicator of increased consumer vulnerability. Empirical evidence suggests that the presence of formally enshrined rights does not guarantee their effective implementation without developed institutional mechanisms, accessible dispute resolution procedures and a sufficient level of legal and digital literacy. In this context, the Turkish experience demonstrates common problems for many states related to the adaptation of traditional protection mechanisms to digital forms of consumption.

The scientific novelty of the article lies in the complex theoretical and legal and comparative legal understanding of the consumer as a vulnerable subject of law based on the material of international standards and the Turkish model of legal protection. The work substantiates that consumer vulnerability is not an exception to the general principle of equality of parties, but an independent legal category that requires regulatory consolidation and institutional support. The novelty also lies in the integration of empirical data into the discussion of legal conclusions, which made it possible to confirm the practical

significance of the concept of vulnerability and to identify the gap between formal regulation and the actual realization of consumer rights.

The consumer in modern economic conditions is objectively a vulnerable subject of law due to information, economic and technological asymmetry.

International consumer protection standards are consistently developing in the direction of strengthening public legal and preventive protection mechanisms.

The Turkish consumer protection model generally complies with international standards, but needs further evolution in terms of normative consolidation of the concept of vulnerability and expansion of preventive regulatory instruments.

Empirical evidence confirms that digitalization increases consumer vulnerability and requires adaptation of traditional legal protection mechanisms.

Recognition of the consumer as a vulnerable subject of law does not limit market freedom, but contributes to the formation of fair, transparent and sustainable consumer relations.

Further development of consumer legal protection should be based on an integrated approach that combines the normative consolidation of the concept of vulnerability, institutional strengthening of supervision and increasing the availability of legal protection, which is in line with modern international trends and the needs of the digital economy.

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