



## 4.13. GR – Greece – National legal summary<sup>277</sup>

### 4.13.1. Applicable regulatory framework

Relevant legislation includes the following:

Primary legislation:

- Ενωμάτωση στην εθνική νομοθεσία της Οδηγίας (ΕΕ) 2010/13 του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου της 10ης Μαρτίου 2010 για τον συντονισμό ορισμένων νομοθετικών, κανονιστικών και διοικητικών διατάξεων των κρατών μελών σχετικά με την παροχή υπηρεσιών οπτικοακουστικών μέσων, όπως έχει τροποποιηθεί με την Οδηγία (ΕΕ) 2018/1808 του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου της 14ης Νοεμβρίου 2018 και άλλες διατάξεις αρμοδιότητας της Γενικής Γραμματείας Επικοινωνίας και Ενημέρωσης<sup>278</sup> (Law no 4779/2021 on incorporation into national legislation of Directive (EU) 2010/13 of the European Parliament and Council of 10<sup>th</sup> March 2010 for the co-ordination of specific legislative, regulatory and administrative provisions of member states concerning the provision of audiovisual media services, as amended by Directive (EC) 2018/1808 of the European Parliament and Council of 14<sup>th</sup> November 2018, and other provisions within the purview of the General Secretariat of Communication and Information – Law 4779/2021)

Secondary legislation:

- Κανονισμός υπ' αριθμόν 3/1991 του Εθνικού Συμβουλίου Ραδιοτηλεόρασης «Περί δεοντολογίας ραδιοτηλεοπτικών διαφημίσεων» (Κώδικας Δεοντολογίας Ραδιοτηλεοπτικών Διαφημίσεων) ΦΕΚ Β' 538/18.07.1991<sup>279</sup> (NCRTV Regulation No 3/1991 on the conduct of radio and television advertising, Government Gazette B 538/18.07.1991 – NCRTV Code)
- Κοινή Υπουργική Απόφαση Υ1/Γ.Π.οικ.81248/2005, Διαφήμιση και χορηγία προϊόντων καπνού σε συμμόρφωση προς την Οδηγία 2003/33/ΕΚ (ΕΕL 152/20.6.2003) του Ευρωπαϊκού Κοινοβουλίου και Συμβουλίου<sup>280</sup> (Common Ministerial Decision Υ1/Γ.Π.οικ.81248/2005, Advertisement and sponsorship of tobacco products in compliance with Directive 2003/33/EC (EEL 152/20.6.2003) of the European Parliament and the Council)
- Κ.Υ.Α. με αριθμ. ΔΥΓ3α/Γ.Π.32221/2013 (ΦΕΚ 1049 Β'/29-4-2013 σχετικό 4) σε συμμόρφωση προς την Οδηγία 2001/83/ΕΚ του Ευρωπαϊκού Κοινοβουλίου και του Συμβουλίου της 6<sup>ης</sup> Νοεμβρίου 2001 για τα φάρμακα που προορίζονται για

<sup>277</sup> The factsheet on Greece incorporates the feedback received from Persa Lambropoulou, Legal Advisor at the National Council for Radio and Television, during the checking round with the national regulatory authorities.

<sup>278</sup> <https://eur-lex.europa.eu/legal-content/EL/TXT/PDF/?uri=NIM:202101621>

<sup>279</sup> [http://www.et.gr/api/DownloadFeksApi?fek\\_pdf=19910200538](http://www.et.gr/api/DownloadFeksApi?fek_pdf=19910200538)

<sup>280</sup> <https://www.e-nomothesia.gr/kat-epikheireseis/kapnos-kapnisma/ya-y1-gp-oik-81348-2005.html>



ανθρώπινη χρήση<sup>281</sup> (Common Ministerial Decision ΔΥΓ3α/Γ.Π.32221/2013, Official Gazette 1049 Β'/29-4-2013, in compliance with Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to medicinal products for human use)

- Υπουργική Απόφαση 93/2/28-1-2014, Γενικές Αρχές και Κανόνες Διεξαγωγής των Τυχερών Παιγνίων που διεξάγονται μέσω ραδιοτηλεοπτικών και τηλεπικοινωνιακών μέσων σύμφωνα με το άρθρο 53 παράγραφος 6 του ν. 4002/2011 (Α' 180), όπως ισχύει<sup>282</sup> (Ministerial Decision 93/2/28-1-2014, General rules and principles on gambling conducted through audiovisual or telecommunication organizations)
- ΥΑ 798//2020 (ΥΑ 79835 ΕΞ ΦΕΚ Β 3265 2020): Θέσπιση Κανονισμού Παιγνίων για Διοργάνωση και Διεξαγωγή Τυχερών Παιγνίων μέσω Διαδικτύου<sup>283</sup> (Ministerial Decision 79835/2020, Official Gazette Β 3265, Adoption of Gaming Regulations for the Organization and Conduct of Games of Chance in the Internet)

Self and co-regulatory instruments:

- *Καταστατικός χάρτης και κατευθυντήριες αρχές για την υπεύθυνη διαφήμιση και επικοινωνία marketing*<sup>284</sup>, (SEE Guide: Charter and guiding principles for responsible advertising and communication marketing).

#### 4.13.2. Definitions and restrictions regarding commercial communications

This section aims at identifying the relevant definitions related to commercial communications stemming from related laws, rules and current practices, as well as ongoing reforms under the transposition and implementation of the revised AVMS Directive. Please note that this review includes definitions which are part of the revised AVMSD, inclusive of audiovisual commercial communications, advertising, surreptitious commercial communications, sponsorship and product placement, but also the definitions of supplementary and/or related concepts, such as the advertiser, sponsor and sponsored content, as well as misleading commercial communication, for the purpose of providing a comprehensive overview.

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<sup>281</sup> <https://www.e-nomothesia.gr/kat-paignia-kazino-internet-kafe/upourgike-apophase-79835-eks-2020.html>.

<sup>282</sup> [https://www.gamingcommission.gov.gr/images/nomiki-vivliothiki/radiotileoptika/fek\\_b\\_205\\_2014.pdf](https://www.gamingcommission.gov.gr/images/nomiki-vivliothiki/radiotileoptika/fek_b_205_2014.pdf).

<sup>283</sup> <https://www.e-nomothesia.gr/kat-paignia-kazino-internet-kafe/upourgike-apophase-79835-eks-2020.html>.

<sup>284</sup> <http://www.see.gr/%ce%ba%cf%8e%ce%b4%ce%b9%ce%ba%ce%b1%cf%82/>.

#### 4.13.2.1. Definitions

**Table 39. Definition of the main concepts related to commercial communications**

Concept	Existence of a definition
Audiovisual commercial communications	Yes.
Television advertising	Yes.
Advertiser	No.
Surreptitious commercial communication	Yes.
Misleading commercial communication	Yes.
Virtual advertising	No.
Sponsorship	Yes.
Sponsor	No.
Sponsored content	No.
Product placement	Yes.
Other:	Marketing communications, mobile advertising, display advertising

Source: Greek response to European Audiovisual Observatory standardised survey

##### 4.13.2.1.1. Audiovisual commercial communications

Article 2§1 (xii) of Law 4779/2021 defines audiovisual commercial communication by transposing the text of the revised AVMSD verbatim as follows:

*Images with or without sound are designed to promote, directly or indirectly, the goods, services or image of a natural or legal person pursuing an economic activity. Such images accompany or are included in a programme or user-generated video in return for consideration or for self-promotional purposes. Forms of audiovisual commercial communication include, inter alia, television advertising, sponsorship, teleshopping and product placement.*

##### 4.13.2.1.2. Television advertising

Law 4779/2021 provides for the definition of television advertising by transposing the text of the revised AVMSD verbatim as follows:

*Any form of television announcement broadcast whether in return for consideration or broadcast for self-promotional purposes by a public or private undertaking or natural person in connection with trade, business, craft or profession in order to promote the supply of goods or services, including immovable property, or a set of rights and obligations.*



#### 4.13.2.1.3. Advertiser

There is no definition of advertiser.

#### 4.13.2.1.4. Surreptitious commercial communication

Article 2§1 (xiv) of Law 4779/2021, by transposing the text of the revised AVMSD verbatim, defines surreptitious audiovisual commercial communication as:

*The representation in words or pictures of goods, services,, the name, the trademark or the activities of a producer of goods or a provider of services, in programmes when such representation is intended by the media service provider to serve as surreptitious advertising and might mislead the public as to the nature. Such representation shall, in particular, be considered intentional if it is done in return for consideration.*

#### 4.13.2.1.5. Misleading commercial communication

A definition of misleading commercial communication is included in the secondary legislative act of the Greek audiovisual regulatory authority, the National Council for Radio and Television (NCRTV)<sup>285</sup> - the NCRTV Code - in Article 2 (d):

*Any advertisement that could in any way, including its presentation, mislead the persons to whom it is addressed and could, for that reason, have an influence over their economic behaviour, or is or could be detrimental to a competitor.*

#### 4.13.2.1.6. Virtual advertising

There is no definition of virtual advertising.

#### 4.13.2.1.7. Sponsorship

Law 4779/2021, in Article 2 paragraph 1 (xv), defines sponsorship by transposing the text of the revised AVMSD verbatim:

*Any contribution made by public or private undertakings or natural person, which are not engaged in providing audiovisual media services or video-sharing platform services or in producing audiovisual works, to the financing of audiovisual media services, video-sharing platform services, user-generated videos or programmes with a view to promoting their name, trademark, image, activities or products.*

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<sup>285</sup> Εθνικό Συμβούλιο Ραδιοτηλεόρασης, <http://www.esr.gr/>



#### 4.13.2.1.8. Sponsor

There is no definition of sponsor.

#### 4.13.2.1.9. Sponsored content

There is no definition of sponsored content.

#### 4.13.2.1.10. Product placement

Article 2§1 (xvii) of Law 4779/2021, by transposing the text of the revised AVMSD verbatim, defines product placement as:

*Any form of audiovisual commercial communication consisting in the inclusion of, or reference to, a product, a service or the trademark thereof so that it is featured within a programme or a user-generated video, in return for consideration.*

#### 4.13.2.1.11. Other definitions

The Greek Advertising Self-Regulation Council (SEE)<sup>286</sup> in 2017 issued a Best Practice Guide on Digital Marketing which defines marketing communications, mobile advertising and display advertising, in its appendix:

*Marketing Communications*

*The term marketing communications includes advertising as well as other techniques, such as promotions, sponsorships and direct marketing, and should be interpreted broadly to mean any communications produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behaviour.*

*Mobile Advertising*

*A form of advertising via mobile phones or other wireless devices (excluding laptops). This type of mobile advertising includes mobile web banner ads, mobile internet sponsorship and interstitials (which appear while a requested mobile web page is loading) as well as mobile paid-for search listings. Mobile internet advertising does not include other forms of mobile marketing such as SMS and MMS.*

*Display Advertising*

*A form of online advertising where an advertiser's message is shown on a destination web page, generally set off in a box at the top or bottom or to one side of the content of the page.*

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<sup>286</sup> Συμβούλιο Ελέγχου Επικοινωνίας, <http://www.see.gr>



#### 4.13.2.2. Restrictions regarding commercial communications

The revised AVMSD introduces obligations for video-sharing platforms to, *inter alia*, respect certain requirements regarding commercial communications and this section aims at updating information relative to these obligations and measures imposed under national legislation on media service providers, including VSP providers related to commercial communications.

In general terms, it should be noted that Law 4779/2021, in Article 32 paragraph 2, relates to audiovisual commercial communications on VSPs:

*Video-sharing platform providers under the jurisdiction of Greece:*

*[a] shall comply with the requirements set out in Article 14(1) with respect to audiovisual commercial communications that are marketed, sold or arranged by those video-sharing platform providers;*

*(b) shall take appropriate measures to comply with the requirements set out in Article 14(1) with respect to audiovisual commercial communications that are not marketed, sold or arranged by those video-sharing platform providers, taking into account the limited control exercised by those video-sharing platforms over those audiovisual commercial communications.*

*Article 32 paragraph 3:*

*Video-sharing platforms under Greek jurisdiction shall clearly inform users where programmes and user-generated videos contain audiovisual commercial communications, provided that such communications are declared according to point (c) of paragraph 6 of Article 32 or the provider has knowledge of that fact.*

Restrictions stemming from the aforementioned provisions are provided below.

##### 4.13.2.2.1. Audiovisual commercial communications for alcoholic beverages and tobacco and tobacco-related products, including electronic cigarettes and refill containers

Article 18(5) of Law 4419/2016 prohibits the advertising of electronic cigarettes and refill containers on the Internet.

Further, the common Ministerial Decision on advertising and sponsorship of tobacco products, in Article 3(2) provides that the restrictions on the advertising of tobacco products applicable in mass media are also applicable in information society services. Article 2 b of this act provides that the term "advertisement" is understood to be any kind of commercial communication that aims at the direct or indirect promotion of a tobacco product.

The Ministry of Health's related interpretation mentions that the direct or indirect use of information society services, such as the Internet and social media, for the promotion of tobacco products, is prohibited.



Regarding alcoholic beverages, there is an indirect prohibition on advertising products that might impair the physical development of minors (see under section 4.13.2.2.9).

#### 4.13.2.2.2. Audiovisual commercial communications for medicinal products and medical treatment available only on prescription in the member state

According to Article 120(1) of the Common Ministerial Decision on the Community code relating to medicinal products for human use, the prohibition on commercial communications for medicinal products and medical treatment available only on prescription is laid out as follows:

- (1). It is prohibited to advertise medicines to the public:*
  - (a) which can only be obtained on prescription in accordance with Part VI;*
  - b) containing psychotropic or narcotic substances, within the meaning of international conventions, such as the United Nations Conventions of 1961 and 1971;*
  - c) reimbursed by social security agencies.*

#### 4.13.2.2.3. Surreptitious audiovisual commercial communications

Law 4779/2021, in Article 32 paragraphs 2(a) - (b), in conjunction with Article 14 paragraph 1(a), prohibits surreptitious audiovisual commercial communications when they are marketed, sold or arranged by VSPs under Greek jurisdiction. In cases where the audiovisual commercial communications are not marketed, sold or arranged by VSPs, the platforms must take appropriate measures to comply with the above restriction to the extent of the limited control that they can exercise over commercial communications (Article 32 paragraph 2(b)).

#### 4.13.2.2.4. Subliminal techniques in commercial communications

While the prohibition of subliminal techniques in commercial communications when they are marketed, sold or arranged by VSPs under Greek jurisdiction is stipulated in Article 32 paragraph 2(a) - (b) in conjunction with Article 14 par. 1(b) of Law 4779/2021, in cases where the audiovisual commercial communications are not marketed, sold or arranged by VSPs, the platforms must take appropriate measures to comply with the above restriction to the extent of the limited control that they can exercise over commercial communications (Article 32 par. 2(b)).

Further, Article 14(8) of the Law 4779/2021 prohibits misleading commercial communications:

*Audiovisual commercial communications shall not mislead the public, especially in relation to the properties of the products and services offered and the conditions of their acquisition or attribute to these products non-scientifically substantiated medical and therapeutic properties violating the provisions of law 2251/1994 on consumer protection (A' 191).*



#### 4.13.2.2.5. Prejudice with regard to human dignity

There are no restrictions on this matter for VSPs under Greek jurisdiction, as, in Greek law, the concept of human dignity contributes to human rights interpretation and adjudication, but is not a standalone human right.

#### 4.13.2.2.6. Inclusion or promotion of any discrimination (e.g., on the grounds of sex, racial or ethnic origin, nationality, religion, etc.)

Article 32 paragraph 1b of Law 4779/2021 provides for the protection of the general public from, *inter alia*, audiovisual commercial communications containing incitement to violence or hatred directed against a group of persons or a member of a group based on race, colour, descent, national or ethnic origin, religion, disabilities, sex, sexual or other identity.

#### 4.13.2.2.7. Encouragement of behaviour prejudicial to health or safety

There are no restrictions on this matter for VSPs under Greek jurisdiction.

#### 4.13.2.2.8. Encouragement of behaviour grossly prejudicial to the protection of the environment

There are no restrictions on this matter for VSPs under Greek jurisdiction.

#### 4.13.2.2.9. Causing physical, mental or moral detriment to minors

Article 32(1) (a) of Law 4779/2021 provides that VSPs should take appropriate measures to protect:

*minors from programmes, user-generated videos and audiovisual commercial communications which may impair their physical, mental or moral development in accordance with Article 9(1) [(that is, art 6a(1) of the directive)].*

Art. 32(4) of Law 4779/2021 provides that:

*Video-sharing platforms under the jurisdiction of Greece shall be encouraged to take measures to prevent the excessive intake by minors of foods and beverages which are not recommended for them. Such measures shall be taken by adopting codes of conduct or standard terms and conditions of business to prevent the presentation of such foods and beverages which are not recommended for minors.*

#### 4.13.2.2.10. Other

N/A.





### 4.13.3. Sponsorship and product placement

Certain obligations stem from the revised AVMSD vis-à-vis sponsorship and product placement and this part aims at identifying the rules and practices pertaining to these two specific categories of commercial communications.

#### 4.13.3.1. Sponsorship

According to Article 32 paragraph 3 of Law 4779/2021, VSPs under Greek jurisdiction must clearly inform users of any audiovisual commercial communications contained in user-generated programs or videos, provided that these communications are either declared in accordance with the provisions of this Law or the provider is aware of them. The use of the general term “audiovisual commercial communications” implies that sponsorship and product placement are included in the scope the above provision.

#### 4.13.3.2. Product placement

See under 4.13.3.1.

### 4.13.4. Obligations regarding (v)blogs and (v)blogging

N/A.

### 4.13.5. Other relevant information

N/A.

### 4.13.6. Content-related rules regarding commercial communications for VSP providers

While certain restrictions regarding the content of commercial communications stem from the revised AVMSD and relate to issues connected to the protection of minors and restrictions on the advertising of certain products and services, this part deals with less-explored notions, such as rules pertaining to gambling, environmental claims vis-à-vis products and services, etc.



#### 4.13.6.1. Advertising of, or on behalf of, associations that are wholly or mainly concerned with religion, faith and other belief systems

No specific provisions deal with this issue, subject to possible inclusion in the envisaged national code of conduct on commercial communications in VSPs. However, the general provisions of Article 32 (1b) of Law 4779/2021 provide for protection of the general public from, *inter alia*, commercial communications containing incitement to violence or hatred directed against a group of persons or a member of a group based on, for instance, religion (see under section 4.13.2.2.6.)

#### 4.13.6.2. Gambling, betting, betting tipsters, etc.

No specific provisions deal with this issue, subject to possible inclusion in the envisaged national code of conduct on commercial communications in VSPs (see under 4.13.7.1.).

According to Article 7 of Ministerial Decision 2014, any gambling advertising on TV stations or gambling websites must clearly mention that the participation of minors is prohibited.

According to Article 7.5 of Ministerial Decision 798/2020, games of chance offered by a licensee over the Internet may be placed with commercial communications, provided that the webpage installs special filters and applications to block access to persons under the age of 21.

Finally, Article 7.6 of Ministerial Decision 798/2020 also provides that:

*Advertising, promotion and display of online games conducted using a random number generator (RNG), as defined in the second case of Article 25 of the law, is permitted exclusively through the website of the licensee, in which the said games are held.*

The abovementioned provisions cover specific advertising activities conducted on the Internet by providers licensed in Greece.

#### 4.13.6.3. Environmental or “green” claims for products

No specific provisions deal with this issue, subject to possible inclusion in the envisaged national code of conduct on commercial communications in VSPs (see under 4.13.7.1.).

There is only a general reference to “green” claims in Article 3 of Annexe III: Ecology and Environment, of the aforementioned self-regulatory code of conduct issued by the SEE, which is not directly applicable to VSPs. According to article 3, expressions in advertising such as “environmentally friendly”, or “ecologically safe” etc. which imply that a product or activity has no impact, or has a positive effect on the environment, should not be used unless fully documented.



#### 4.13.6.4. Other

N/A.

### 4.13.7. Self- and co-regulation and enforcement

This section aims at identifying the legal framework and practice for self- or co-regulatory schemes and measures regarding commercial communications on VSPs, including identification of the body or bodies in charge of self- and co-regulation and enforcement powers with regard to commercial communications and VSPs, as well as the scope of their activities with regard to commercial communications and VSPs.

#### 4.13.7.1. Self- and co-regulatory bodies

##### 4.13.7.1.1. Context of establishment and legal background

There is no specific mention in the explanatory memorandum of draft Law 4779/2021 related to this provision.

Law 4779/2021, in Article 6, provides that VSPs established in Greece are encouraged to adopt national codes of conduct in order to further protect consumers and minors, as well as public health and fair competition. Paragraph 2 of the same Article details how these codes should be drafted and how their implementation should be assessed (i.e., be broadly accepted by the relevant stakeholders, set out clearly and unambiguously their objectives, provide for regular, transparent and independent monitoring and evaluation of the achievement of the objectives aimed and include provisions to ensure their effective compliance). In addition to this, Article 32 paragraph 8 gives NCRTV the competence to initiate the process for the drafting of a code with regard to matters relating to the implementation of the measures set out in the Article 32.

##### 4.13.7.1.2. Stakeholders involved

The existing Greek self-regulatory body SEE is an independent national self-regulatory organisation of the Greek advertising industry. SEE was established by Article 9 of Law 2863/2000, which, in paragraph 1, provides that free-to-air radio and TV stations, pay-TV platforms as well as the Association of Advertising Companies of Greece, the Association of Advertisers of Greece and any other representative organisation of advertisers, shall jointly draw up a code of conduct regulating the content of commercial communications and manner of their display in electronic media.

Besides, Law 4779/2021, in Article 6 paragraph 1, stipulates that the stakeholders in relation to the self-regulatory related measures are VSPs established in Greece, advertisers and consumer associations:



*Media service providers, video-sharing platform and advertising and communication service providers, as well as any associations thereof, shall be encouraged to adopt national codes of conduct in order to further protect consumers and minors, as well as public health and fair competition.*

#### 4.13.7.1.3. Scope and objectives

In the codes mentioned under 4.13.7.1.1., VSPs must clearly and unambiguously set out their objectives which should aim to protect consumers and minors as well as public health and fair competition. In a general approach, self-regulatory measures are considered to be more effective. In the emerging sector of VSPs, measures adopted on the basis of a national code of conduct are expected to have the active support of the providers.

Their scope includes ACCs for HFSS foods and beverages, inappropriate ACCs for alcoholic beverages and ACCs which encourage behaviours grossly prejudicial to the protection of the environment.

#### 4.13.7.1.4. Code(s) of conduct

Besides the awaited codes of conducts to be adopted by VSPs (see under 4.13.7.1.1.), it should be mentioned that the existing Greek Best Practice Guide on Digital Marketing, adopted by SEE, confirms that digital advertising techniques are subject to the same rules as traditional advertising and points out the importance of the general principle of separation between commercial communications and editorial content.

#### 4.13.7.1.5. Role of the (self-)regulatory bodies

As mentioned under 4.13.7.1.1., the codes of conduct to be adopted by VSPs must clearly and unambiguously set out their objectives. The main role of the bodies is to provide for regular, transparent and independent monitoring and evaluation of the achievement of the objectives set up under the relevant codes of conduct, as well as to ensure effective compliance by their members (Article 6 paragraph 2 of the Law 4779/2021).

#### 4.13.7.1.6. Period of activity (if limited)

N/A.

#### 4.13.7.1.7. Role of the regulatory authority in a co-regulatory system:

##### 4.13.7.1.7.1. Regulatory body

According to Article 6 paragraph 3, the codes of conduct to be adopted by VSPs (see under 4.13.7.1.1.) can be adopted in cooperation with the NCRTV and/or consumer associations.



#### 4.13.7.1.7.2. Co-regulatory scheme

According to Article 6 of Law 4779/2021, VSPs are encouraged to adopt codes of conduct either on a self-regulatory level or on a co-regulatory level in cooperation with the NCRTV.

In order to fulfil this obligation, the NCRTV is in the process of creating a national register, which will include: a) the identity of VSPs established in Greece, b) their contact details, c) the identity of their legal representative. This process is still ongoing.

#### 4.13.7.1.7.3. Relationship and roles of stakeholders

N/A.

### 4.13.7.2. Monitoring/evaluation, compliance and sanctioning powers

Article 32 paragraph 1 of Law 4779/2020 provides that VSPs under Greek jurisdiction shall take appropriate measures to protect minors and the general public from inappropriate commercial communications (such as incitement to violence, hate messages, child pornography, racism, xenophobia).

VSPs have to comply with the obligations concerning surreptitious audiovisual commercial communications or subliminal techniques, as mentioned in Article 32 paragraph 2 of Law 4779/2021.

Compliance of VSPs with these obligations is entrusted to the NCRTV which may conduct audits via its employees or third parties to whom such audits shall be assigned (Article 32 paragraph 9, law 4779/2021).

Violations of this obligation can be sanctioned by the NCRTV. According to Article 36 paragraph 3, the sanctions that can be imposed can be: (a) a recommendation, (b) an administrative fine from EUR 1 000 to 500 000, (c) a pause of transmission from 1 day to 3 months, and (d) a permanent shutdown in proportion to the kind and gravity of the violation.

Besides, according to Article 31 paragraph 5, the NCRTV has to compile a register containing all VSPs established in Greece. The information that VSPs have to submit will be determined in a directive issued by NCRTV.

## 4.13.8. Cross-sector and cross-border collaboration

N/A.



#### 4.13.9. Update on plans and practices relative to new obligations of VSPs

N/A.

#### 4.13.10. Studies, reports and research

N/A.

#### 4.13.11. Data compilation

This factsheet is based on data compiled by Charis Tsigou, attorney-at-law at Markoulakis & Tsigou Law Firm.