



4.13. GR – Greece⁹⁶

4.13.1. Key findings

In Greece, Article 28b (1) of the Audiovisual Media Services Directive (AVMSD) is transposed by Law 4779/2021. To ensure the protection of minors, VSP providers in Greece are required to draw up terms and conditions in alignment with the provisions of its Articles 32(1) and 14(1) and must also establish and operate age verification systems. They are also required to develop easy-to-use systems allowing users to rate the content and easy-to-use mechanisms allowing users to report or flag harmful content, while providing transparency on how these actions are processed. Additionally, the introduction of parental control systems is mandatory. VSPs are also required to set up procedures to resolve disputes arising from user complaints and offer effective media literacy measures to help users navigate and understand the online environment.

4.13.2. National transposition of Article 28b (1) AVMSD

Title, type of the legislation	Key excerpts of legal measures	Link
Law 4779 of 20 February 2021 (Article 32 paragraphs 1 and 5)	Paragraph 1. Without prejudice to Articles 11 to 14 of Presidential Decree 131/2003 (Government Gazette, Series I, No. 116), video-sharing platforms under the jurisdiction of Greece shall take measures to protect: (a) 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); Paragraph 5. To comply with paragraphs 1 and 2, video-sharing platforms under the jurisdiction of Greece shall take appropriate measures in each case, which shall be defined depending on the type of content	Legislation

⁹⁶ The summary on Greece incorporates the feedback received from Persa Lambropoulou, legal advisor at the National Council for Radio and Television (NCRT), during the checking round with the national regulatory authorities.



Title, type of the legislation	Key excerpts of legal measures	Link
	<p>concerned, the damage likely to be caused by that content, the characteristics of the group of persons that need to be protected, as well as the rights and legitimate interests at stake, including the interests of the video-sharing platform providers and of the users having created or uploaded the content, as well as the general public interest.</p> <p>Article 32 paragraph 6.</p> <p>For the purposes of the protection of minors, as provided for in point (a) of paragraph 1, the most harmful content shall be subject to the strictest access control measures.</p> <p>Those measures shall consist of, as appropriate:⁹⁷</p> <p>(a) laying down terms and conditions of use of the platform relating to fulfilling the requirements set out in paragraph 1, as well as methods for the mandatory application of these terms and conditions;</p> <p>(b) laying down terms and conditions of use of the platform relating to fulfilling the requirements set out in Article 14(1) for audiovisual commercial communications that are not marketed, sold or arranged by the video-sharing platform providers, as well as methods for the mandatory application of these terms and conditions;</p> <p>(c) having a functionality for users who upload videos generated by them or others to declare whether such videos contain audiovisual commercial communications as far as they know or can be reasonably expected to know; ...</p>	

⁹⁷ Due to a technical (legal) error, it seems that the measures provided in Article 32 under paragraph 6 refer only to the protection of minors. However, as is evidenced from the text of the provisions, which reflect the general measures foreseen in the AVMSD, these measures describe the obligations of VSPs in general, including those related to the protection of minors. This issue has been flagged by the national media regulatory authority (NCRT) to the competent ministry with a request to correct it by inserting a number to begin a new article.



4.13.3. Types of measures put in place by VSPs

All of the larger VSPs featured in this report, and this includes many which are not under the jurisdiction of Greece but which can be accessed within the territory, have imposed a minimum age requirement of 13, with the exception of Vimeo (16 or above the minimum age required by law), BitChute (18) and Onlyfans (18). Age verification systems mostly require users to indicate their date of birth, without additional verifications, but other solutions include age verification by credit card, by the uploading of photo ID, or the use of age estimation technology. Various types of parental control measures responding to the specificities of each VSP can be found (blocking and filtering, recording of activities, limiting time of use, viewing history). X (formerly Twitter) and Vimeo have no such measures, despite being accessible to minors. Neither do BitChute and OnlyFans, as they require users to be over 18. All of the larger VSPs featured in this report make use of flagging and reporting mechanisms as well as other content moderation tools. These are detailed in the tables in sections 3.2 and 3.3.

4.13.4. VSPs under the jurisdiction of the national regulatory media authority

N/A

4.13.5. Measures specific to adult VSPs in general

Most adult VSPs accessible in Greece only require the user to confirm that they are above 18 years of age.

4.13.6. Additional rules referring especially to influencers

No specific rules that apply to influencers can be identified within the legal framework of Greece. However, a recent initiative, outlined in Regulatory Decision 1/2022 by the national media regulatory authority (NCRT) and launched in July, aims to document all existing audiovisual services. This initiative includes influencers and is a step toward understanding and potentially formalising their role in the media landscape. In addition, the NCRT is cooperating with the associations of advertisers and advertising agencies and Greece's Self-Regulation Council (SEE) to form a commonly accepted framework of rules for the supervision and voluntary compliance of those active in influencer marketing.