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FLASH NOTES

April – May 2026

Competition Law Notes@Greece

Hellenic Competition Commission Submits Views to the European Commission on Territorial Supply Constraints

01/25

The Hellenic Competition Commission (the "HCC") has submitted its views in response to the European Commission's (the "Commission") call for evidence on tackling unjustified territorial supply constraints ("TSCs").

TSCs may consist of contractual, technical or informal practices used by multinational suppliers to fragment national markets and restrict retailers' ability to source products from other Member States. Such practices may limit cross-border trade in daily consumer goods and their removal could contribute to greater affordability and support consumer purchasing power.

Key takeaways:

- Price differences: While some price differences between Member States may be justified by factors such as different legal requirements, languages, logistics costs or local consumer preferences, others may reflect unjustified market fragmentation.
- Limits of competition law scope of application: The HCC notes that existing competition law may not capture all relevant practices, particularly unilateral conduct by suppliers that do not hold a dominant position.
- Need for *ex ante* EU legislation: The HCC supports the adoption of EU legislation identifying prohibited practices in advance. In the HCC's view, this would allow scrutiny of conduct by suppliers below the dominance threshold where such conduct may adversely affect the internal market and consumers. The HCC considers that an approach based on relative market power or economic dependence would not be appropriate, given the time and complexity involved in *ex post* enforcement. It also takes the view that softer tools, such as self-regulation, codes of conduct or guidelines, would not adequately address unjustified TSCs, due to their limited deterrent effect in cases of non-compliance and the financial incentives that may underpin market partitioning strategies.

Merger Notes@Greece

HCC Approves MASOUTIS' Acquisition of Sole Control over KRITIKOS Subject to Remedies

02/25

By unanimous Decision No. 911/2026, the HCC approved the acquisition of sole control by DIAMANTIS MASOUTIS SUPER MARKET S.A. ("MASOUTIS") over ANEDIK KRITIKOS S.A. ("KRITIKOS").

The HCC assessed the concentration in the retail and wholesale markets for supermarket goods. In the retail market, the assessment was carried out at the local level, with the relevant geographic market defined by reference to a 10-minute driving radius from the target stores in urban areas and a 30-minute driving radius in non-urban areas.

As part of its assessment, the HCC conducted a digital mapping exercise of supermarkets throughout Greece and found that, in 60 out of the 586 local markets where horizontal overlaps were identified, the new entity's post-merger combined market share would exceed 50%. In this regard, the HCC considered that the transaction raised serious competition concerns in those local markets, relating to the creation or strengthening of a dominant position.

To address these concerns, MASOUTIS offered commitments consisting of:

- The divestiture of six company-owned supermarkets located in Rethymno and Chalkidiki.
- The termination of the use of trademarks by 47 partner stores affiliated with either MASOUTIS or KRITIKOS trademarks, in various local areas across Greece.
- The appointment of a Monitoring Trustee, independent from the parties and subject to the HCC's approval, to monitor the proper implementation of the remedies.

The HCC found the proposed commitments to be sufficient, proportionate and appropriate to address the identified competition concerns. Following implementation of the remedies, the new entity's total market share is expected to fall below 50% in the relevant local markets, while competitive pressure is expected to increase through the entry or strengthening of competing retail networks or independent operators.

On this basis, the HCC unanimously approved MASOUTIS' acquisition of sole control over KRITIKOS, subject to the terms and conditions set out in the aforementioned commitments.

Competition Law Notes@EU

Commission Updates EU Competition Rules for Technology Licensing

03/25

The Commission has adopted the revised Technology Transfer Block Exemption Regulation (TTBER) and accompanying Guidelines, following a review of the 2014 rules. The TTBER exempts certain technology transfer agreements from the prohibition of Article 101(1) TFEU where the conditions of Article 101(3) TFEU are presumed to be met, while the Guidelines explain how Article 101 TFEU applies to technology transfer agreements falling within or outside the block exemption. The new TTBER entered into force on 1 May 2026 and replaces Regulation 316/2014, which expired on 30 April 2026.

Key points:

- Data licensing: The Guidelines introduce dedicated guidance on licensing of certain types of data for production purposes, clarifying that licensing databases protected by copyright or the EU database right is generally pro-competitive and will be assessed under principles akin to technology transfer under Article 101 TFEU.
- Licensing Negotiation Groups (LNGs): The framework distinguishes genuine LNGs, i.e. arrangements whereby technology implementers agree to negotiate the terms of technology licences jointly, from buyer cartels, and sets out assessment factors and risk-mitigation measures under Article 101 TFEU.
- Simplified thresholds: The application of TTBER market-share thresholds is simplified for early-stage licensing, i.e. where licensing occurs before a technology has been commercialised, reflecting practical difficulties in market definition and share calculation at that stage.
- Technology pools: The Guidelines specify the conditions for the safe harbour applicable to pool arrangements where multiple owners contribute technology rights to a package, so that the benefit is reserved to pools compatible with Article 101 TFEU.

Commission Conducts Unannounced Inspections in Chocolate Confectionery Sector

04/25

The Commission carried out unannounced inspections at the premises of a company active in the chocolate confectionery sector in two Member States. The Commission has concerns that the company may have violated EU antitrust rules prohibiting cartels and restrictive practices, as well as abuse of a dominant position. In particular, the investigation focuses on possible market segmentation, including restrictions on the trade of goods between Member States and obstacles to multi-country purchases. The inspections are a preliminary investigative step and do not imply that the company has infringed EU competition law.

Commission Intensifies Proceedings Against Meta Over WhatsApp Third-Party AI Access

05/25

The Commission has issued a Supplementary Statement of Objections to Meta, setting out its intention to order the reinstatement of third-party general-purpose AI assistants' access to WhatsApp under the same conditions as before 15 October 2025.

Following a Statement of Objections sent on 9 February 2026 (for further information click here), the Commission maintains its preliminary view that Meta's conduct amounts to an exclusion of rivals from the rapidly growing market for AI assistants. Although Meta announced a revised policy on 4 March 2026 introducing a pricing framework for third-party assistants, the Commission has preliminarily found that this policy is in effect equivalent to the previous access ban. To prevent serious and irreparable harm to competition, the Commission intends to impose interim measures until it reaches a final decision, and, by a separate opening decision taken in cooperation with the Italian competition authority, has expanded its investigation to cover the whole of the EEA.

General Court Dismisses Red Bull Claim for Inspection-Related Lawyers' Fees

06/25

In its judgment in Case T-682/24, the General Court dismissed an action by Red Bull GmbH and its subsidiaries challenging the Commission's refusal to reimburse lawyers' fees incurred when an inspection was continued at the Commission's premises in Brussels.

In particular, the General Court held that the term additional costs refers exclusively to the additional costs incurred by the inspection being carried out at the Commission's premises, as compared with the costs which an undertaking would have incurred had the inspection continued at its own premises, and which relate exclusively to that inspection at the Commission's premises.

In this regard, the General Court found that Red Bull had already received legal assistance during the inspection at its premises and that such assistance would likely have continued throughout the inspection had it remained on-site. The General Court therefore held that those legal fees were not additional costs arising exclusively from the continuation of the inspection at the Commission's premises and, as such, were not reimbursable.

General Court Upholds Commission's Fine in Pierre Cardin Antitrust Case

07/25

In Case T-87/25, the General Court dismissed Ahlers' action against the Commission's Pierre Cardin antitrust decision.

In particular, the Commission had found that Ahlers and the Pierre Cardin companies had infringed Article 101 TFEU and Article 53 of the EEA Agreement by participating in agreements or concerted practices relating to the marketing of Pierre Cardin-branded products in the EEA, and imposed a fine of EUR 3.5 million on Ahlers.

Ahlers did not challenge the finding of infringement, but only the amount of the fine, arguing that the Commission had wrongly calculated the 10% turnover cap under Article 23(2) of Regulation 1/2003 by taking into account its consolidated turnover, including the turnover generated by Ahlers AG before the latter's insolvency and transfer to a third-party investor.

The General Court rejected Ahlers' arguments. It held that the Commission had not erred in taking into account Ahlers' consolidated turnover for the relevant financial year, including Ahlers AG's turnover. According to the General Court, that turnover reflected Ahlers' actual economic situation during the infringement period, since Ahlers and Ahlers AG formed part of a single economic unit throughout the infringement and during part of the relevant financial year. The General Court therefore held that the Commission had not committed an error of law in calculating the 10% turnover cap and dismissed the action in its entirety.

CJEU Clarifies Jurisdiction in Multi-Defendant Cartel Damages Claims

08/25

The Court of Justice of the European Union (the "CJEU") delivered its judgment in joined cases C-672/23 and C-673/23, clarifying the application of Article 8(1) of Regulation (EU) No 1215/2012 relating to the jurisdiction of multiple defendants, in the context of two actions for damages arising from infringements of Article 101 TFEU.

Key takeaways:

- A close connection under Article 8(1) may exist between a claim against an anchor defendant who has not been identified as liable for an infringement found by the Commission or a national competition authority and claims against other defendant companies, provided there are serious indications that the relevant entities belong to the same undertaking, within the meaning of EU competition law, to which the infringement has been attributed.
- Foreseeability is not an independent criterion under Article 8(1), but operates as a general principle in applying the special jurisdiction rule.
- Courts should not assess the prospects of success of the claim against the anchor defendant when determining international jurisdiction. Such prospects may be considered only as an indication of artificial reliance on Article 8(1).
- Damage suffered outside the EEA does not, in itself, render a competition damages claim manifestly unfounded at the jurisdictional stage.
- Article 8(1) determines both the international and territorial jurisdiction of the court of the Member State where the anchor defendant is domiciled.

- A court initially seised under Article 8(1) may, under national procedural rules, decline territorial jurisdiction in favour of another court in the same Member State, provided this does not undermine the effectiveness of the Regulation.

CJEU Rules on No-Poach Agreement in Portuguese Football During Pandemic

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09/25

The CJEU has issued its judgment in Case C-133/24, concerning an arrangement between Portuguese professional football clubs and the Portuguese Professional Football League, under which the parties agreed not to recruit players who had unilaterally terminated their contracts due to the COVID-19 crisis.

The CJEU held that such an agreement, which is equivalent to a no-poach agreement, constitutes a manifest restriction of a key competitive parameter in high-level sport, namely clubs' ability to recruit players, and may also have an indirect, potential impact on the purchase price of players. Accordingly, it must be categorised as a restriction of competition by object, unless a specific examination of its content, competition-related objectives and the specific economic and legal context clearly shows why it should not be so categorised.

At the same time, the CJEU acknowledged the exceptional context of the COVID-19 pandemic and the specific features of professional football. In particular, though the agreement pursued an objectively anticompetitive aim on the player recruitment market, it also pursued an objectively pro-competitive aim, namely ensuring the stability of player rosters so that the season could resume under conditions preserving the integrity of the competition.

The CJEU therefore left it to the national court to determine, first, whether the agreement presented a sufficient degree of harm to be classified as a restriction by object. Only if the agreement is not so classified should the national court assess whether Article 101(1) TFEU may be inapplicable under the proportionality framework, having regard to the legitimate public-interest objective of ensuring the regularity and integrity of sporting competitions.

Key takeaways for businesses:

- No-poach agreements remain a red flag and may be treated as restrictions of competition by object.
- The assessment is context-specific. Exceptional circumstances and sector-specific features may be relevant, but do not create a safe harbour.
- Businesses should exercise caution. In light of increased EU enforcement scrutiny of no-poach agreements, including the Delivery Hero/Glovo decision, companies should seek competition law advice before engaging in any coordination relating to recruitment, hiring practices or employee mobility.

Merger Notes@EU

Commission Opens In-Depth Investigation into Proposed UPM-Sappi Joint Venture

10/25

The Commission has opened an in-depth investigation under the EU Merger Regulation into the proposed joint venture between UPM-Kymmene and Sappi, two of the largest manufacturers of communication paper products in the EEA. The Commission's preliminary concerns focus on whether the transaction may reduce competition in certain communication paper and specialty paper markets in the EEA, potentially leading to higher prices, less choice or reduced quality for customers.

The Commission will assess, first, horizontal concerns in communication paper, in particular magazine paper/coated mechanical paper and fine paper/woodfree coated paper, where UPM and Sappi are major suppliers, each other's main rivals and where the joint venture would control a significant portion of EEA production capacity.

It will also examine concerns in specialty paper markets. These include potential spill-over / coordination effects in coated-one-side face material ("C1S"), where UPM and Sappi are close competitors and would retain activities competing with the joint venture, as well as potential vertical foreclosure concerns in pressure-sensitive labels ("PSL"), where C1S face material is a key input and UPM would remain active downstream in PSL. In particular, the Commission will assess whether the joint venture could restrict competing PSL suppliers' access to C1S face material.

It is noted that the Commission has 90 working days until 26 October 2026 to take a decision.

DSA Notes

Commission Preliminarily Finds Meta in Breach of Digital Services Act Over Protection of Minors

11/25

The Commission has preliminarily found that Meta's Instagram and Facebook are in breach of the Digital Services Act (DSA) for failing to diligently identify, assess and mitigate the risks of minors under 13 accessing their services. Despite Meta's own terms setting a minimum age of 13, the Commission's investigation indicates that children can bypass restrictions by self-declaring false birth dates without robust verification, while tools for reporting under-13 users are hard to access and often lack proper follow-up.

The Commission's preliminary findings also point to an incomplete and arbitrary risk assessment that contradicts extensive evidence from across the EU suggesting that roughly 10–12% of children under 13 use Instagram and/or Facebook. The investigation further covers risks arising from the design of Facebook's and Instagram's interfaces that may exploit minors' vulnerabilities, including potential "rabbit-hole" effects and addictive-use patterns.

Meta now has the opportunity to examine the file and respond to the Commission's preliminary findings. If the Commission's view is ultimately confirmed, it may adopt a non-compliance decision and impose fines of up to 6% of Meta's total worldwide annual turnover as well as impose periodic penalty payment to compel Meta to comply.

State Aid Notes

Commission Adopts Temporary Aid Framework to Support Sectors Affected by the Middle East Crisis

12/25

The Commission has adopted the Middle East crisis Temporary State aid Framework ("METSAF"**)**, a targeted and temporary framework applying until 31 December 2026, which enables Member States to support sectors most affected by the Middle East crisis, namely agriculture, fishery, transport and energy-intensive industries.

In particular, for agriculture, fishery, land transport and intra-EU short sea shipping, Member States may compensate up to 70% of the additional costs caused by fuel and fertilizer price increases.

The framework also provides for a simplified option, allowing aid of up to EUR 50,000 per beneficiary without requiring detailed proof of actual consumption.

For energy-intensive industries, the METSAF introduces a temporary adjustment to the Clean Industrial Deal State aid Framework, allowing aid intensity for electricity price relief to increase from 50% to up to 70% of eligible electricity costs, covering up to 50% of the beneficiary's total consumption.

Measures under the METSAF must be notified to the Commission, which will assess them through a fast approval process.

Commission Approves Electricity Price Relief for Energy Intensive Companies

13/25

The Commission has approved State aid schemes for Bulgaria (€334 million), Germany (€3.8 billion), and Slovenia (€90 million) to provide temporary electricity price relief for energy-intensive industries. Approved under the Clean Industrial Deal State Aid Framework (CISAF), the schemes aim to support companies in sectors exposed to a significant risk of relocation outside the EU due to high electricity costs. As a core condition, beneficiaries are required to reinvest at least 50% of the aid received into decarbonization measures or assets that reduce electricity system costs.

In-Depth Investigation into Romanian Support for Cernavoda Nuclear Reactor

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14/25

The Commission has opened an in-depth investigation to assess whether Romania's planned €3.2 billion support package for the refurbishment of Unit 1 at the Cernavoda nuclear power plant aligns with EU State aid rules. While the Commission considers the project necessary for long-term low-carbon electricity and energy security, the Commission has expressed doubts regarding the proportionality of the aid package, which includes grants, state guarantees, and a two-way contract for difference (CfD). The investigation will specifically examine if the measure provides efficient operational incentives and whether design elements comply with the 2024 Electricity Regulation.

CJEU Clarifies Scope of the De Minimis Aid for Retailers of Fishery Products

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15/25

In Case C-811/24 (*Pescheria Il Granchio Blu*), the CJEU ruled that the retail sale of fish, crustaceans, and mollusks falls under the concept of "processing and marketing" within the fisheries and aquaculture sector. Consequently, companies engaged in the retail of such products fall within the scope of Regulation (EU) No 717/2014 (de minimis aid in the fisheries sector) rather than the general de minimis regulations.

This clarification is pivotal for national authorities when granting tax benefits or aid in earthquake-affected zones, as it prevents the misapplication of general aid frameworks to specialized sectors already governed by specific EU market organizations.

CJEU Dismisses Appeal on Lufthansa's €6 Billion COVID 19 Recapitalization

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16/25

In Case C-457/23 P, the CJEU dismissed the appeal by Deutsche Lufthansa AG, upholding the General Court's prior annulment of the Commission's 2020 aid decision. While the CJEU found that the General Court had erred in several legal assessments regarding eligibility and market power, it ultimately rejected the appeal because the Commission failed to ensure that hybrid capital conversion prices complied with the Temporary Framework. Specifically, the CJEU ruled that the Commission could not postpone its assessment of conversion prices to an *ex-post* stage, as State aid compatibility must be clearly established at the time of the initial authorization.

Tax Notes

European Commission Tax Omnibus-Legislative Proposal Expected on 24 June 2026

17/25

On 14 April 2026, the upcoming EU "Omnibus on taxation" was discussed at the Platform for Tax Good Governance meeting, where the European Commission presented the results of its call for evidence on tax simplification. The public consultation, which ran from 16 February to 30 March 2026, received 117 contributions, with stakeholders, in particular business representatives, calling for an ambitious simplification agenda to reduce administrative burdens, legal uncertainty and fragmentation across Member States. Key concerns raised include disproportionate compliance costs, inconsistent implementation of EU tax directives and barriers to cross-border activity. Respondents broadly supported enhanced harmonization and simplification of existing frameworks, notably as regards withholding tax procedures under the Interest and Royalties Directive and the Parent-Subsidiary Directive, the interaction between ATAD and Pillar Two rules, and the efficiency of dispute-resolution mechanisms. The Commission is expected to present its "Omnibus on taxation" on 24 June 2026, with the proposal set to streamline five key corporate tax directives: ATAD, the Parent-Subsidiary Directive, the Interest and Royalties Directive, the Tax Merger Directive, and the Tax Dispute Resolution Mechanisms Directive. If adopted, the Omnibus would represent the most significant simplification of EU direct tax law in years and would have direct implications for Greek businesses operating cross-border within the EU.

AADE Circular No A.1094/2026 on the Extension of Time Limits Set for the Application of Phase B Regarding Digital Delivery Notes

18/25

AADE Circular no A.1094/2026 further postpones the effective date of Phase B regarding digital delivery notes, and divides implementation Phase B into two separate, distinct implementation sub phases.

Accordingly, under Sub Phase B1, as of 12 October 2026, data on loading, unloading, and receipt procedures for the digital monitoring and traceability of inventory movement, as well as data on quantitative and qualitative inventory checks, should be uploaded in the MyData tax authorities' portal, whilst under Sub Phase B2, as of 1 January 2027, goods classification, in accordance with the EU Combined Nomenclature, becomes obligatory.

Employment Notes

Draft Bill Introducing Pay Transparency and Equal Pay in Line with EU Directive 2023/970

19/25

The Ministry of Labour and Social Security introduced the draft bill entitled "Strengthening the Application of Equal Pay between Men and Women for Equal Work or Work of Equal Value, and Other Provisions – Transposition of EU Directive 2023/970" , which will remain under public consultation from 4 June 2026 until 17 June 2026.

According to the provisions of the draft Bill, employers will be required to disclose salary levels or salary ranges during the hiring process and will no longer be allowed to ask candidates about previous earnings. Recruitment procedures must also remain gender-neutral and free from discrimination.

The Bill further strengthens the role of collective labour agreements, recognizing them as a key mechanism for ensuring fair and transparent wage structures. More specifically, employers applying collective agreements will benefit from simplified compliance procedures, while the Labour Inspection Authority will retain full inspection and enforcement powers.

A key provision introduces mandatory gender pay gap reporting. Companies with 250 or more employees will need to report annually on gender pay differences, while certain smaller businesses will report every three years. Where unjustified pay gaps of 5% or more are identified, employers will be required to take corrective measures.

The legislation also enhances employees' legal protection by strengthening access to salary information, legal remedies, and representation through trade unions or equality bodies.

In addition to pay transparency measures, the draft Bill includes provisions to:

- Extend hazardous and heavy-duty status to specific healthcare and ambulance personnel within the public health system.
- Recognize apprenticeship periods at DYPA vocational schools as professional experience.
- Allow remote participation in labour dispute resolution procedures.
- Establish a Digital Registry for Collective Labour Agreements to improve public access and monitoring.

According to the Ministry, the draft Bill already incorporates 65 proposals submitted by social partners, including employer associations and labour representatives.

Law 5297/2026 Establishes Occupational Health and Safety Provisions for Economic Activities

20/25

By virtue of Article 127 of Law 5297/2026 on the simplification of the framework governing economic activities, the Regional Directorates for Occupational Health and Safety Inspection are designated as the competent supervisory and management authorities in the field of occupational health and safety. The Law further provides that their responsibilities include risk assessment and classification, inspection planning and implementation, cooperation with other supervisory authorities, management of complaints and workplace accidents, imposition of sanctions, monitoring of inspectors' activities, and guidance to businesses and employees to ensure compliance with occupational health and safety legislation.

Issuance of Ministerial Decision No. 15441/2026 Regarding the Expansion of the Digital Work Card System

21/25

The Ministry of Labour and Social Security issued Ministerial Decision No. 15441 (Government Gazette B' 3051/02.06.2026), updating the scope of the Digital Work Card system and aligning the existing covered sectors with the new Business Activity Codes (KAD) 2025 classification introduced by the Independent Authority for Public Revenue (AADE).

The Decision updates the list of economic activities already subject to the Digital Work Card framework by mapping the existing KAD 2008 classifications to the new KAD 2025 codes. The update covers a broad range of sectors, including manufacturing, wholesale and retail trade, hospitality, food and beverage services, financial and insurance activities, travel services, security services, and vehicle repair activities.

A significant amendment introduces the mandatory application of the Digital Work Card system, effective from 2 June 2026, for businesses operating in the following sectors:

- telecommunications and information services, including telecommunications providers and related intermediary services;
- administrative and support services, including employment agencies, temporary staffing agencies, cleaning services, facility management, and landscaping activities;
- human health and social care activities, including hospitals, medical and dental practices, diagnostic laboratories, physiotherapy services, nursing services, and other healthcare-related activities;
- additional service activities specified under the new KAD 2025 classification.

Businesses falling within the Digital Work Card system must ensure compliance for all employees working with a physical presence at their premises, including employees engaged through employee loan agreement, regardless of whether individual branches operate under covered or non-covered KAD.

The Decision further clarifies the exemption criteria. Businesses whose principal KAD is not included in the Digital Work Card system remain exempt, even if certain secondary activities or branches fall within covered sectors. Exemptions also apply where the registered principal KAD generates no economic activity and the economically dominant secondary activity is not covered by the system.

Although the new sectors are required to comply with the Digital Work Card obligations from 2 June 2026, administrative penalties related to non-compliance will only be imposed from 12 October 2026, providing employers with a transitional period to complete implementation.

In addition, according to the Ministry of Labour and Social Security's press release dated 02.06.2026, the Digital Work Card system is expected to be further expanded through a pilot implementation phase running from 29 June until 15 November 2026, covering the following sectors:

- consulting services, advertising and other office support activities;
- repair services;
- warehousing and transport support activities (logistics);
- water collection and wastewater management activities, and
- gambling and betting activities.

GDPR Notes

EU Reaches Agreement on AI Act Simplification and Ban on "Nudifier" Apps

22/25

The European Parliament and the Council have reached a provisional agreement on targeted amendments to the EU Artificial Intelligence Act (AI Act) as part of the European Commission's Digital Omnibus simplification package.

The agreement aims to reduce regulatory complexity for AI providers while preserving the AI Act's core risk-based framework and safeguards for fundamental rights.

Under the revised timeline, obligations for high-risk AI systems will be postponed:

- Until 2 December 2027, for high-risk use cases such as biometrics, critical infrastructure, education, employment, law enforcement and border management.
- Until 2 August 2028, for AI systems used as safety components under sector-specific EU safety legislation.

The agreement also delays watermarking obligations for AI-generated content until 2 December 2026.

A major addition to the legislation is the explicit EU-wide ban on "nudifier" AI applications and AI systems used to generate child sexual abuse material. The prohibition covers systems that create sexually explicit deepfake images, videos or audio of identifiable individuals without consent, as well as systems lacking sufficient safeguards to prevent such misuse.

Additional simplification measures include:

- Removal of overlapping compliance obligations for AI-enabled machinery products.
- Narrower definitions of "safety component" to avoid unnecessary high-risk classification.
- Permission to process personal data where strictly necessary to identify and correct algorithmic bias, subject to safeguards.

- Expanded exemptions for small mid-cap enterprises (SMCs).
- Streamlined enforcement for certain general-purpose AI systems through the EU AI Office.

The provisional agreement shall be formally adopted by both the European Parliament and the Council before entering into force. EU lawmakers aim to finalize the draft before 2 August 2026.

The European Data Protection Board Issues New Scientific Research Guidelines and Advances GDPR Certification Framework

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23/25

The EDPB has adopted new Guidelines on the processing of personal data for scientific research purposes, aiming to provide greater legal clarity for researchers while facilitating compliance with the GDPR.

According to the EDPB, activities may qualify as “scientific research” under the GDPR where they demonstrate six key characteristics:

- a methodical and systematic approach;
- adherence to ethical standards;
- verifiability and transparency;
- autonomy and independence;
- clearly defined research objectives; and
- contribution to existing scientific knowledge or novel applications of such knowledge.

The guidelines clarify that further processing of personal data for scientific research purposes is generally presumed compatible with the original purpose of collection, eliminating the need for an additional compatibility assessment under the GDPR. However, controllers must still ensure that the original legal basis remains valid for the subsequent research processing activities.

The EDPB also provides guidance on the use of “broad consent”, where research purposes are not fully defined at the time of data collection, as well as the use of “dynamic consent” for specific future research projects. Additional safeguards and adherence to ethical standards remain essential where broad consent is relied upon.

The Guidelines further address:

- limitations to data subjects’ rights, including the rights to erasure and objection in certain research contexts;
- the allocation of responsibilities between controllers, joint controllers and processors;
- the implementation of safeguards such as anonymization, pseudonymisation, secure processing environments and privacy-enhancing technologies.

The draft guidelines will remain open for public consultation until 25 June 2026.

In parallel, the EDPB announced the creation of a dedicated “sprint team” to accelerate the finalization of forthcoming anonymization guidelines. Finally, for the first time, the EDPB approved Europrivacy as a certification mechanism that may be used as a safeguard for international data transfers.

Corporate Notes

Law 5297/2026 Introduces New Consumer Protection Measures

24/25

The Ministry of Development has introduced new consumer protection measures under Law 5297/2026, strengthening transparency obligations for businesses and expanding digital consumer complaint mechanisms.

More specifically, suppliers will now be required to place a specific label on pre-packaged products whose quantity has been reduced without a corresponding reduction in price. This obligation applies to businesses that manufacture products or import them into the Greek market.

In addition, another provision of Law 5297/2026 establishes the development of the mobile application "Mykataggelies", through which consumers will be able to submit both anonymous and named complaints directly via their smart devices. This initiative is intended to simplify reporting procedures and strengthen consumer protection enforcement mechanisms.

Inheritance Law Reform Notes

Law 5303/2026 Enacts Inheritance Law Reform

25/25

Greece has formally enacted Law 5303/2026, introducing a comprehensive reform of inheritance law and modernizing key aspects of succession, wills, and heirs' rights, which will apply to inheritance cases arising from 16 September 2026 onwards.

Among the most important changes are stricter safeguards for handwritten wills, including enhanced authenticity checks and procedural protections aimed at reducing fraud and inheritance disputes. At the same time, the Law strengthens the role of notaries and digital registration mechanisms for wills.

A major innovation is the introduction of inheritance agreements, allowing parties to arrange succession matters in advance under predefined conditions. The mechanism is expected to be particularly useful for family businesses, agricultural holdings, and long-term succession planning. The Law also expands legal protections for partners in civil unions and extends certain housing and inheritance protections to cohabiting partners. Several provisions specifically amend the Greek Civil Code to strengthen the protection of family residences and inheritance rights in modern family arrangements.

In relation to inherited debts, the reform revises the framework governing heirs' liability for estate obligations, aiming to provide clearer safeguards and improved procedures for acceptance or renunciation of inheritances.

From a procedural perspective, the Law introduces new rules concerning the publication of inheritance agreements, the recognition of handwritten wills, and the declaration of inheritance acceptance or renunciation before Greek courts.

The reform additionally includes provisions relating to:

- protection of heirs' personality rights after death;
- administration of minors' inherited property;
- judicial liquidation of estates;
- simplification of co-heir relations;
- the abolition of outdated inheritance law mechanisms no longer considered practical.

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