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FLASH NOTES

June - July 2026

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Competition Law Notes@Greece



Greek Competition Act Amended: Strengthened HCC Enforcement and Procedural Safeguards

01/33

Law 5317/2026 introduces amendments to the Greek Competition Act (Law 3959/2011, as in force), further aligning the Greek framework with the ECN+ Directive. The amendments strengthen the Hellenic Competition Commission's ("HCC") enforcement toolkit, particularly in relation to cross-border enforcement and non-cooperation, while reinforcing procedural safeguards for inspections of non-business premises.

Key Takeaways:

- Simplified cross-border enforcement: in certain cases, including where an undertaking is not established in the requesting Member State, the requesting competition authority is no longer required to provide information evidencing reasonable efforts to enforce the decision in its own territory before seeking enforcement by the HCC.
- Expanded sanctions for non-cooperation in information-gathering procedures: the sanctions framework is extended to expressly cover failure to appear for a deposition, alongside existing sanctions for non-compliance with requests for information or oral explanations.
- Procedural safeguards for private premises: inspections of non-business premises, including the homes of directors, managers or employees, require an order from the competent local Prosecutor and the presence of a judicial representative, where there are reasonable grounds to suspect that relevant evidence is kept there.

HCC Fines Wholesaler Online Sales Restrictions

02/33

By Decision No. 913/2026, the HCC imposed a reduced fine of €954,485 on VF HELLAS CLOTHING L.T.D. ("VF HELLAS") following settlement proceedings concerning contractual restrictions on retailers' online sales, which constituted hardcore restrictions of competition. In particular, VF HELLAS:

- imposed a total prohibition on the use of price comparison platforms; and
- prohibited retailers from using advertising services on search engines, particularly Google Ads.

Key Takeaways for Businesses:

Suppliers should review contractual restrictions affecting retailers' online sales. In particular, outright bans on price comparison tools or search engine advertising may qualify as hardcore restrictions and expose businesses to significant fines.

HCC Seeks Market Feedback on Booking.com Commitments

03/33

The HCC has launched a market test on commitments proposed by Booking.com following an investigation into a suspected abuse of dominance in the online hotel intermediation services. The HCC's preliminary concerns relate to the combined effect of Booking's Default Ranking Mechanism, Preferred Partner Programmes and Booking Sponsored Benefit, which may incentivize accommodation providers to offer more favorable prices and terms on Booking than on competing OTAs, thereby hindering competing OTAs from entering or expanding in the Greek market.

Booking has proposed commitments aimed at addressing the HCC's concerns, with market participants invited to submit comments by 27 July 2026.

Merger Notes @Greece



HCC and Six NCAs Support Revised EU Merger Guidelines

04/33

The HCC, together with the competition authorities of Austria, Belgium, the Czech Republic, Ireland, the Netherlands and Portugal, has issued a joint statement welcoming the European Commission's ("Commission") draft revised EU Merger Guidelines. The authorities stress that effective competition remains the core objective of merger control and a key driver of European competitiveness, innovation and sustainable growth. They also recognize that considerations such as resilience, sustainability and cross-border integration within the EU may be relevant where they constitute parameters of competition, while noting that the internal market benefits from scale where this is achieved through open and pro-competitive market processes and efficient asset reallocations, and that SMEs depend on open, competitive markets.

Competition Law Notes@EU



Commission Orders Meta to Restore Free WhatsApp Access for Rival AI Assistants

05/33

The Commission has imposed interim measures on Meta, requiring it to restore within five working days third-party general-purpose AI assistants' access to the WhatsApp for Business API under the terms applicable before 15 October 2025, notably free of charge, and to maintain such access until a final decision is adopted. The Commission's preliminary view is that Meta, which is dominant in the EEA-wide market for consumer communication applications, may have abused its position by restricting rival AI assistants' access to WhatsApp. It also considered that the fee subsequently introduced by Meta was, in practice, equivalent to the previous access ban. The measures aim to prevent serious and irreparable harm to competition in the rapidly developing market for general-purpose AI assistants, while the Commission's antitrust investigation remains ongoing.

Commission Market Tests Sanofi Commitments Over Alleged Disparagement of Rival Flu Vaccine

06/33

The Commission is seeking feedback on commitments offered by Sanofi to address preliminary concerns that it may have abused a dominant position in the enhanced influenza vaccine markets in France and Germany through a misleading communication campaign targeting healthcare professionals. The campaign allegedly disparaged CSL Seqirus' competing Fluad vaccine, including through claims concerning its scientific evidence base and national vaccination recommendations. Sanofi has proposed corrective communications and additional commitments concerning its communications with healthcare professionals on enhanced influenza vaccines.

Interested parties may submit comments by 21 August 2026.

Commission Rejects Profarm Complaint Against Amgen Over Direct Distribution

07/33

The Commission has rejected a complaint by Greek pharmaceutical wholesaler Profarm alleging that Amgen's switch to direct distribution and subsequent refusal to supply wholesalers is an abuse of dominance. As regards Greece, the Commission declined to reassess the substance of the complaint, as the HCC had already examined the same conduct, involving the same undertakings, geographic market and timeframe. It also rejected allegations of a wider refusal-to-supply practice in other low-price Member States, citing lack of legitimate interest and concrete supporting evidence.

Key takeaways for businesses:

The decision indicates that a dominant pharmaceutical supplier may restructure its distribution model, including by moving to direct distribution, subject to the limits established in the *Sot. Lélos* case law. In particular, a dominant supplier may not refuse to meet ordinary orders from existing wholesalers merely to restrict parallel exports, although it may take reasonable and proportionate measures to protect its legitimate commercial interests against orders that are out of the ordinary.

Commission Opens Antitrust Investigation into Align Technology Over Alleged Tying

08/33

The Commission has opened a formal antitrust investigation to assess whether Align Technology may have abused its dominant position by tying its iTero intra-oral scanners to its market-leading Invisalign clear aligners in the EEA. The investigation focuses on Align's alleged restrictive interoperability strategy, including (i) refusing to approve competing scanners for the automated submission of Invisalign orders and (ii) refusing to accept scans generated by other intra-oral scanners, despite their use of industry-standard file formats. According to the Commission, these practices may have created a closed ecosystem around Invisalign, shielding iTero scanners from competition. The investigation is ongoing and does not prejudge its outcome.

Commission Makes SAP Commitments Binding Over ERP Support Practices

09/33

The Commission has made legally binding commitments offered by SAP to address concerns that it may have restricted competition in maintenance and support services for its on-premises ERP software. The Commission's preliminary concerns focused on restrictions on terminating support and maintenance services for unused licences, reinstatement and back-maintenance fees charged to customers who re-subscribe to SAP maintenance and support after a period of absence, systematic extensions of initial contract periods during which support and maintenance services could not be terminated, "all-or-nothing" support and maintenance requirements obliging customers to obtain support from SAP for all their on-premises ERP software and to apply the same support type and pricing conditions across their entire SAP software landscape, thereby limiting their ability to mix and match support providers and service levels.

SAP has committed to allow customers to split their SAP software landscape and choose different support and maintenance providers or support levels for separate parts, as well as to terminate licenses and related support and maintenance fees in specified circumstances. It will also abolish reinstatement fees, reduce back-maintenance fees, and stop restarting the initial non-terminable support period when customers purchase additional licenses. The commitments will apply worldwide for 10 years and will be monitored by an independent trustee.

General Court Upholds Commission Information Requests Covering Professional Communications on Personal Devices

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10/33

The General Court of the European Union ("General Court") dismissed Vivendi's and Lagardère's challenges against Commission's requests for information issued in an investigation into suspected gun-jumping in connection with their merger. The General Court confirmed that the Commission may use its powers under the EU Merger Regulation to seek evidence of suspected merger control infringements.

Importantly, Commission's requests for information may cover emails, instant messages and other professional communications stored on personal accounts or devices, provided those tools have been used at least once for professional purposes. The General Court acknowledged that the collection of such material may constitute a serious interference with privacy rights, given the volume and potentially sensitive nature of the personal information concerned.

However, the General Court found the interference proportionate, noting that the Commission did not have complete and uncontrolled access to personal devices and that the requests were limited to identified individuals, a defined period and specified search terms. The General Court also relied on procedural safeguards, including the separate and encrypted submission of sensitive personal data, the use of a virtual data room for certain material, and restricted access by Commission officials subject to professional secrecy. The availability of judicial review was also recognized as a fundamental safeguard.

Key Takeaways for Businesses

Professional communications may fall within the scope of a Commission information request even when stored on personal devices, accounts or messaging applications, provided those tools have been used for professional purposes. Businesses and employees should therefore be aware that the use of personal communication channels does not, by itself, place business-related communications outside the Commission's investigative reach.

CJEU Upholds €4.1 Billion Google Android Fine

11/33

The Court of Justice of the European Union ("CJEU") dismissed Google and Alphabet's appeal in the *Google Android* case, upholding the €4.125 billion fine imposed by the General Court, for anticompetitive practices relating to the Android operating system.

Key takeways:

- The Court confirmed that Google's pre-installation conditions (tying Google Search and Chrome to the Play Store) had anticompetitive effects. In assessing those effects, the General Court was entitled to consider the relevant economic context as a whole, including the portfolio-based revenue share agreements, even though those agreements were not established as standalone abuses, as they could be taken into account as contextual factors reinforcing the exclusionary effects of the pre-installation conditions. The CJEU also confirmed that a counterfactual analysis was not required and upheld the finding that pre-installation creates a *status quo bias*, as users tend to continue using apps that are already installed and readily available on their devices rather than actively seeking alternatives.

- The CJEU confirmed that establishing an abuse is not necessarily conditional on demonstrating that the conduct is capable of foreclosing as-efficient competitors. Given the characteristics of the digital markets concerned, the practices could be found capable of restricting competition and strengthening barriers to entry without such an analysis.

- The CJEU upheld the finding that the anti-fragmentation agreements, which restricted manufacturers from selling devices running non-compatible Android versions, were capable of limiting the commercial opportunities of those versions and strengthening Google's dominant position. The CJEU also confirmed that a counterfactual analysis was not required where the anticompetitive effects had otherwise been sufficiently established.

CJEU Rules on Sports Federation Regulations Governing Player Agents

12/33

In Case C-428/23, the CJEU clarified the application of the *Wouters/Meca-Medina* case law to rules adopted by the German Football Association (DFB) governing the use of player-agent services, including registration, remuneration and disclosure requirements. The CJEU did not determine whether the specific DFB rules were lawful, leaving that assessment to the German Federal Court of Justice.

Key Takeaways:

- The Wouters/Meca-Medina case law may, under certain conditions, apply to rules adopted by a sports federation which, while addressed to its members, regulate their use of services provided by third-party undertakings that are not members of the federation, such as player agents. The CJEU noted that professional football operates as an interconnected ecosystem in which clubs, federations, players and agents interact and cooperate, so achieving legitimate objectives may require a sports federation to adopt rules capable of affecting third-party service providers within that ecosystem.

- Such rules may benefit from the *Wouters/Meca-Medina* case law only if they do not have the object of restricting competition and are justified by a legitimate public-interest objective, in relation to which they are appropriate, necessary and proportionate.
- The relevant conditions need not necessarily be assessed provision by provision. They may instead be assessed in relation to a set of provisions pursuing a distinct objective or producing a distinct effect.

CJEU Clarifies Safeguards for Email Seizures in Competition Inspections

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13/33

In Joined Cases C-258/23, C-259/23 and C-260/23, the CJEU, sitting as the Grand Chamber, clarified the safeguards applicable to the seizure of business emails and access to personal devices during competition inspections, drawing a distinction between corporate communications and devices used for both professional and private purposes.

Key Takeaways:

- Business emails remain protected communications: emails exchanged through a company's messaging service are protected by the rights to privacy and personal data protection, even where they are entirely business-related. Their seizure therefore constitutes an interference with those fundamental rights.
- No general requirement for prior court authorization: business emails the content of which relates to the subject matter of the inspection may be seized during inspections at business premises without prior court authorization, provided that the authority does not have unlimited or generalized access, the data are used only to identify the anticompetitive conduct under investigation, and the seizure is subject to full ex post judicial review.
- Stricter protection applies to personal devices used for both private and professional purposes: where inspectors access mobile phones, computers or other storage media belonging to employees or managers and used for both private and professional purposes, such access must be subject to prior review by a court or an independent administrative body.
- Distinction from Vivendi/Lagardère: unlike the General Court's recent judgments concerning Commission information requests for professional communications stored on personal devices, these cases concern direct access to and seizure of data during a dawn raid, involving more direct access to personal data and therefore requiring stronger procedural safeguards.

Key Takeaways for Businesses:

Businesses should ensure that their dawn-raid protocols distinguish between corporate email systems and employees' personal devices. While business emails may be seized without prior court authorization subject to strict safeguards and effective ex post judicial review, access to employees' or managers' personal devices used for both private and professional purposes requires prior independent review.

Merger Notes@EU



ECN Sets Out Principles for Merger Call-In Mechanisms

14/33

The ECN has issued a Joint Statement recognizing merger call-in mechanisms as a potentially effective tool for reviewing below-threshold transactions that may nevertheless harm competition. The Statement highlights transactions that may escape traditional turnover-based thresholds, including acquisitions of start-ups, roll-up strategies, mergers in highly concentrated local markets and concentrations in low-turnover industries, while stressing the need to balance effective merger control with legal certainty and predictability. Greece is among the Member States currently considering the introduction of such a mechanism.

Key Takeaways:

- Material scope: call-in powers should be limited to below-threshold transactions that may prima facie lead to material anticompetitive effects in the relevant territory.
- Criteria for activating call-in powers: to enhance legal certainty, national regimes may set additional eligibility criteria for triggering a call-in, including a local nexus, such as present or foreseeable activities or local effects, as well as thresholds based on turnover, transaction value or market share.
- Temporal scope: the possibility to call in a transaction should, in principle, be limited to a pre-defined period, reducing prolonged uncertainty for transaction parties.
- Legal certainty: jurisdictions should consider complementary tools such as informal guidance, voluntary notification and consultation mechanisms, enabling businesses to better assess whether a below-threshold transaction may become subject to merger review.

State Aid Notes



General Court Rejects Ryanair's Challenges Against Italian COVID-19 Airline Compensation Schemes

15/33

In its judgments in Cases T-268/21 RENV and T-538/24 (*Ryanair v Commission*), delivered on 8 July 2026, the General Court dismissed Ryanair's actions seeking the annulment of the Commission's decisions approving Italian State aid schemes that compensated eligible airlines for damages suffered due to COVID-19 travel restrictions.

Following the CJEU's judgment setting aside an earlier ruling in Case T-268/21, the General Court confirmed that the Italian schemes - both in their initial form (€130 million) and in their extended and amended version - are fully compatible with EU State aid rules under Article 107(2)(b) TFEU.

Key Takeaways:

- Minimum Remuneration Condition Upheld: Conditioning aid eligibility on airlines paying personnel with an Italian "home base" at least the minimum remuneration set by national collective agreements does not infringe the freedom to provide services (Article 56 TFEU) or conflict-of-law rules under the Rome I Regulation (Article 8). Member States are entitled to require compliance with domestic social protection standards for staff habitually working from a local base.

- General Schemes & Damage Calculation: When assessing a general compensation scheme, the Commission is not required to examine individual pre-existing financial difficulties or group-level aid of potential beneficiaries. The Commission's damage calculation methodology - combining baseline revenue data, retention rates, and strict ex-post audit mechanisms - properly isolated pandemic-related losses and effectively prevented overcompensation.

General Court Upholds Commission Decision Ordering Czechia to Recover Unlawful Agricultural Aid from Large Enterprises

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In its judgment in Joined Cases T-310/24 and T-311/24 (*Úsovsko Agro and Úsovsko Eko v Commission*), delivered on 15 July 2026, the General Court dismissed actions seeking the annulment of the Commission's decision that declared unlawful State aid schemes implemented by Czechia for large agricultural enterprises (for orchard restructuring and drip irrigation) incompatible with the internal market and ordered aid recovery.

The General Court affirmed that under the EU Agricultural State Aid Guidelines, large enterprises must submit a detailed counterfactual scenario in their initial aid application so that granting authorities can verify the incentive effect prior to the start of works. The General Court ruled that ex post counterfactual scenarios submitted years later during a formal investigation lack credibility and cannot remedy that omission.

Furthermore, without an initial counterfactual scenario, authorities cannot verify whether the aid is limited to the minimum necessary under the "net-extra cost approach". The General Court confirmed that systematic aid grants to large enterprises under unnotified scheme updates constitute unlawful new aid schemes that the Commission was bound to evaluate strictly under its published guidelines.

CJEU Rules National VAT Exemption for Financial Sector Services Constitutes Unlawful State Aid

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In its judgment in Case C-360/25 (*Schoger II*), the CJEU held that a VAT exemption for services provided between undertakings primarily engaged in banking, insurance, or pension activities constitutes State aid within the meaning of Article 107(1) TFEU when those services fall outside the exhaustive list of financial exemptions in the EU VAT Directive.

The CJEU ruled that the Austrian tax provision is a unilateral state measure lacking an EU law basis, involving a loss of state resources, and granting a selective economic advantage to financial institutions over other service providers in comparable situations, thereby distorting competition in the internal market. Furthermore, the CJEU rejected Austria's request to limit the temporal effects of the judgment, concluding that the risk of serious economic disruption had not been established.

CJEU Dismisses Commission Appeal in German Combined Heat and Power (CHP) State Aid Case

18/33

In its judgment in Case C-242/24 P (*Commission v Germany / Cogeneration Aid*), delivered on 9 July 2026, the CJEU dismissed the Commission's appeal, fully upholding the General Court's annulment of the Commission's decision that had classified Germany's 2020 Combined Heat and Power Act (KWKG 2020) support mechanisms as State aid under Article 107(1) TFEU. Reaffirming the two alternative criteria for establishing "State resources", mandatory levies or constant public control, the CJEU ruled that because German network operators were legally permitted, but not legally obligated to pass the KWKG surcharge downstream to final electricity consumers, the funds used to compensate CHP generators remained private financial resources rather than mandatory state charges. Furthermore, the CJEU rejected the Commission's narrow reading of the *PreussenElektra* doctrine, confirming that statutory payment obligations imposed between private entities using their own financial resources do not constitute State aid merely because they stem from state legislation or confer an economic advantage.

FDI Notes

The New EU FDI Screening Regulation and the Evolution of the European Investment Screening Landscape



19/33

On the 26th of June 2026, the European Parliament and the Council of the European Union published the new EU FDI Screening Regulation (EU) 2026/1386. The new Regulation establishes a comprehensive and harmonized framework regarding the screening of foreign investments in the European Union that will come into full effect on the 17th of January 2028. The new regulation marks a significant evolution towards a more harmonized and comprehensive European investment screening model. Under the new framework, all 27 Member States must operate a mandatory screening mechanism to a common baseline standard. Moreover, member states are mandated to ensure that their regimes cover sensitive sectors, including

defense and dual-use items, certain critical technologies, critical infrastructure, strategic raw materials, financial market infrastructure and electoral infrastructure.

Notably, the scope of the Regulation has been expanded in order to capture certain intra - EU transactions where the immediate EU investor is ultimately owned or controlled by a non EU investor. The updated framework also explicitly includes small and medium-sized enterprises operating in these sensitive industries and introduces a standardized Phase 1 review baseline of 45 calendar days.

While however the aforementioned framework moves the EU regime from an enabling framework towards a more harmonized model, it does not create a single EU filing system or give the Commission final decision-making authority. Lastly, while the Greek regime already incorporates certain elements of the broader approach now reflected in the new Regulation, as Greece operates a mandatory FDI screening regime covering non-EU investors and certain EU investors with third-country ownership or control, across a range of sensitive and particularly sensitive sectors, the Greek framework will, however, need to be adjusted to ensure full alignment with the Regulation's broader mandatory minimum scope, including the screening of transactions in certain sectors not currently expressly covered by Law 5202/2025 at the moment.

Employment Notes

Law No. 5316/2026 on "Strengthening the Implementation of Equal Pay for Women and Men for the Same Work or Work of Equal Value and Other Provisions"



20/33

The Hellenic Parliament adopted Law No. 5316/2026, transposing Directive (EU) 2023/970 into Greek law. The Law aims to strengthen the principle of equal pay for women and men performing the same work or work of equal value by introducing enhanced pay transparency requirements, reporting obligations, and enforcement mechanisms. The main provisions of Articles 8–20 and 27 will enter into force on 1 November 2026.

Scope

The Law applies, depending on the relevant provision, to employers, employees, and job applicants in both the public and private sectors.

Key Measures:

- **Pay structures**: Employers must establish objective, gender-neutral pay structures based on criteria such as skills, effort, responsibility and working conditions.

- **Pay reporting**: Gender pay gap reporting obligations will be introduced on a phased basis to employers with 100 or more employees. Employers with 250 or more employees and those with 150–249 employees must submit their first report by 7 June 2027, while employers with 100–149 employees must first report by 7 June 2031. Reporting frequency will depend

on employer size: employers with 250 or more employees will report annually, while employers with 100–249 employees will report every three (3) years, following the first applicable reporting date.

- **Transparency**: Employers must disclose the initial salary or salary range before recruitment and are prohibited from requesting candidates' salary history. Employees will also benefit from enhanced rights to pay-related information. In particular, employers must make easily accessible the criteria used to determine pay, pay levels, and pay progression. Employers with fewer than 50 employees may be exempt from the obligation to provide information on pay progression criteria. Employees will also have the right to request and receive written information on their individual pay level and on average pay levels, broken down by gender, for employees performing the same work or work of equal value. Such information must be provided within two (2) months of the request.

- **Joint pay assessment**: Where an unjustified gender pay gap of at least 5% is identified and remains unaddressed for six months, employers must carry out a joint pay assessment with employees' representatives and implement corrective measures within one year.

- **Enforcement**: The Law strengthens the rules on the burden of proof in pay discrimination cases, provides for administrative fines, and grants employees the right to full compensation and reparation in cases of pay discrimination, including compensation for actual loss, loss of opportunity and moral damage, without any statutory upper limit.

- **Institutional framework**: The Greek Ombudsman is designated as the national equality body, while the National Transparency Authority and a newly established Equal Treatment and Equal Pay Unit within the Labour Inspectorate are entrusted with enhanced monitoring and enforcement responsibilities.

Expansion of the Digital Work Card System to Additional Business Sectors (Ministerial Decisions No. 15441/2026 and No. 18047/2026)

21/33

The Ministry of Labour and Social Security has updated and significantly expanded the mandatory application of the Digital Work Card system through Ministerial Decisions No. 15441 (Government Gazette B' 3051/02.06.2026) and No. 18047 (Government Gazette B' 3791/29.06.2026), both amending the framework originally established under Ministerial Decision No. 49758/2022. In addition to broadening the scope of the system, the Decisions align the existing covered sectors with the new Business Activity Codes (KAD 2025) introduced by the Independent Authority for Public Revenue (AADE), updating the relevant activities across manufacturing, trade, hospitality, food and beverage services, financial services, security, and vehicle repair.

The expansion is implemented in two consecutive phases:

- **First Phase (effective from 2 June 2026)**: Under Ministerial Decision No. 15441/2026, mandatory coverage was extended to telecommunications and information services, human health and social care activities, including hospitals, medical practices, diagnostic centres, and nursing services, as well as administrative and support services, including employment and temporary staffing agencies, cleaning services, facility management, and landscaping. Administrative fines and penalties for non-compliance in these sectors will apply from 12 October 2026, following a transitional implementation period.

- **Second Phase (effective from 29 June 2026)**: Under Ministerial Decision No. 18047/2026, mandatory coverage was further extended to water supply, sewerage, and waste management; warehousing and logistics activities; head office operations and management consultancy; advertising, public relations, and market research; office administration and call centre services; gambling and betting; and repair and maintenance services for computers, household goods, and motor vehicles. Employers in these sectors are granted a transitional period until 15 November 2026, with administrative penalties applying from 16 November 2026.

Across all newly included sectors, compliance is mandatory for all personnel working with a physical presence at the employer's premises, including employees engaged through employee loan agreements.

The Decisions further clarify that the obligation is determined by the business's principal activity code (KAD) registered in TAXIS. Accordingly, enterprises remain exempt where their principal KAD falls outside the scope of the Digital Work Card system, even if individual branches or secondary activities operate under covered KADs. Where the registered principal KAD generates no economic activity, based on the latest tax return (Form E3), the obligation is assessed by reference to the economically dominant secondary activity. If that secondary activity also falls outside the scope of the system, the enterprise remains exempt.

Labour Inspection Authority Introduces New System for Filing Complaints Regarding Health and Safety

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22/33

The Labour Inspection Authority issued Decision No. 384724/2026 (Government Gazette B' 3773/25.06.2026), introducing the Complaints and Occupational Accident Management System.

The new framework establishes the procedures and assessment criteria for the handling, evaluation and management of complaints and occupational accidents falling within the competence of the Labour Inspectorate in the field of occupational health and safety. The detailed operating rules of the system are set out in the Annex to the Decision, which forms an integral part thereof.

Labour Inspection Authority Introduces Compliance Action Model for Occupational Health and Safety

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23/33

The Labour Inspection Authority issued Decision No. 384695/2026 (Government Gazette B' 3688/23.06.2026), establishing the Compliance Action Model (CAM) in the field of Occupational Health and Safety.

The Compliance Action Model sets out the procedures, guidance and decision-making framework to be followed by Labour Inspectors following inspections that identify breaches of occupational health and safety legislation. Its purpose is to promote a consistent and risk-based approach to enforcement and to support businesses in achieving compliance with applicable health and safety requirements.

Extension of the National General Collective Labour Agreement Until 31 December 2026

24/33

The validity of the 2021 National General Collective Labour Agreement (Registration No. 16/2021), which was initially extended until 30 June 2023 (Registration No. 15/2022) and subsequently until 31 December 2025 (Registration No. 8/2024), has been extended once again.

Under Registration No. 13/2026, the Agreement remains in force in its entirety, under the same terms and conditions, from the expiry of the previous extension until 31 December 2026**.**

ERGANI II Information System: New Leave Categories Added

25/33

The ERGANI II Information System has been updated with new leave categories, which are now available for selection when submitting employee leave declarations.

The newly introduced leave types include:

- Reduced Working Hours for Parents of Children with Disabilities (hour-based);
- Bereavement Leave for Parents (day-based);
- Gynaecological Examination Leave (day-based); and
- Election Leave (day-based).

Employers are required to use the new dedicated leave categories when submitting relevant declarations through the ERGANI II system. Where these types of leave were previously undeclared or reported under a general leave category, they must now be declared exclusively using the newly introduced leave codes.

Classification of Occupational Health and Safety Violations and Determination of Fines

26/33

By virtue of Ministerial Decision No. 20844/2026 (Government Gazette B' 4560/24.07.2026), a new framework for the classification of violations and the determination of administrative fines has been introduced in the field of occupational health and safety, in accordance with paragraph 8 of Article 151 of Law 4512/2018.

Under the new framework:

- violations identified during market surveillance inspections are classified into specific categories based on their nature and severity;

- the applicable administrative fines for occupational health and safety infringements are determined according to the established classification criteria;
- the framework applies to inspections carried out within the scope of market surveillance in the area of employees' health and safety.

The Ministerial Decision aims to ensure a more consistent, transparent and effective approach to the assessment of occupational health and safety violations, strengthen enforcement procedures and promote compliance with workplace health and safety obligations.

Extension of Maternity Protection Framework for Working Mothers

27/33

By virtue of a new Ministerial Decision No. 19794 (Government Gazette B' 4631/24.07.2026), the framework governing special maternity leave and the maternity protection benefit has been expanded, introducing a comprehensive set of measures aimed at extending protection to a broader category of working mothers, eliminating existing inequalities, and promoting equal treatment in employment.

Under the new framework:

- adoptive mothers may benefit from the special maternity protection benefit following completion of the adoption process, even where they have returned to work in the interim period;
- additional working hours performed by part-time employees are taken into account when assessing eligibility for the full maternity protection benefit, so that the benefit reflects actual working time;
- the maternity protection benefit may be granted even where the employee has not received the maternity benefit from e-EFKA, in cases where the employer has provided more favourable treatment by paying full remuneration during maternity leave;
- employees with parallel employment may remain eligible for the benefit, provided that they do not perform work during the daily working hours covered by the special maternity protection leave;
- the benefit is extended to employees working in seasonal businesses, provided that their employment relationship remains active; and
- previous insurance status as a non-salaried worker, such as self-employed professional, no longer excludes working mothers from receiving the maternity protection benefit.

The new framework aims to further strengthen maternity protection, support working families and promote a better balance between professional and personal life by ensuring equal access to maternity-related rights regardless of employment status or previous insurance history.

GDPR Notes

Legal Framework on Political Communication and Personal Data Protection Following Recent Case Law and Regulatory Updates

28/33



The Hellenic Data Protection Authority (HDPA) and recent landmark criminal law court rulings have solidified the legal framework governing political communication via electronic messages (emails/SMS), confirming that the processing of electors' personal data for political purposes is subject to strict legal requirements.

Political communication involving personal data must comply with the General Data Protection Regulation (GDPR) and national law across the following areas:

I. Legal Basis and Data Origin

Political communication may be based either on the data subject's consent or the candidate's legitimate interest. However, the existence of a legal basis alone is insufficient. Data controllers must also demonstrate the lawful origin of the data and comply with the purpose limitation principle. The use of personal data originally collected for an entirely different purpose, such as state registration or public administration, is strictly prohibited.

II. Transparency Requirements under Regulation (EU) 2024/900

Under Regulation (EU) 2024/900, fully applicable since October 2025, political communication in the form of political advertising or targeted promotional campaigns is subject to specific transparency obligations. Such communications must carry clear labeling, sponsor details, total costs, and information regarding the targeting techniques used.

III. Permitted and Prohibited Practices

According to HDPA Guidelines, the processing of personal data for political communication is **permitted** only where:

- the data was lawfully collected during a citizen's prior voluntary participation in the candidate's events or activities;
- the data was obtained within the context of a personal professional relationship; or
- the candidate is a party member and has lawfully obtained the data of members or "friends" of the party, as explicitly provided in the party's Statute.

Each communication must also clearly state the sender's identity, the source of the data, and an accessible mechanism enabling individuals to exercise their rights, including the right to object or unsubscribe.

Conversely, the use of the following date is **strictly prohibited**:

- electoral registers containing email addresses, as emails addresses are explicitly excluded from the lists provided to political parties under Article 23 of P.D. 26/2012;

- personal data provided to public administration authorities for unrelated administrative purposes; or
- data acquired without a documented prior legal basis.

IV. Enforcement and Data Subjects' Rights

In cases of non-compliance, individuals retain the right to object to the processing, file a complaint with the HDPA, and seek civil compensation under Article 82 of the GDPR for material or non-material damage.

The AI Omnibus has Entered into Force

29/33

The AI Omnibus entered into force on 27 July 2026, introducing targeted simplifications to the EU AI regulatory framework while maintaining safeguards for safety and fundamental rights.

Key changes are the following:

- Extended deadlines: The rules applicable to high-risk AI systems will apply from 2 December 2027, while the rules for high-risk AI systems embedded in products will apply from 2 August 2028.
- Extended simplifications: Obligations previously amplified for SMEs are extended to small mid-cap companies (SMCs).
- Regulatory sandboxes: Access to regulatory sandboxes is expanded, including through the introduction of an EU-level AI regulatory sandbox.
- Reduced administrative burden: AI literacy and EU database registration requirements are simplified.
- Stronger safeguards: The framework introduces a ban on AI systems generating non-consensual intimate content and strengthens measures to detect and address bias.
- Enhanced oversight: The AI Office receives broader oversight powers in relation to certain AI systems, including those based on general-purpose AI models.

EU AI Act: Enforcement and New Transparency Rules

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From 2 August 2026, the European Commission’s AI Office, together with national competent authorities, will begin enforcing key provisions of the EU AI Act, including new transparency requirements.

Key developments include:

- AI transparency: Chatbots and other interactive AI systems must inform users when they are interacting with AI, while deepfakes and AI-generated or altered content must be appropriately labelled and include machine-readable markings.
- GPAI obligations: Providers of General-Purpose AI (GPAI) models must comply with documentation, copyright and training-data transparency requirements, with additional obligations applying to models posing systemic risks.

- Prohibited AI practices: Enforcement begins in relation to AI systems involving harmful manipulation, exploitation of vulnerabilities and certain forms of unfair social scoring.
- Stronger enforcement: The AI Office, national competent authorities and the European Data Protection Supervisor will share enforcement responsibilities, depending on the AI system concerned.
- Reporting tools: The AI Office has introduced complaint and whistleblower channels to facilitate the reporting of potential violations of the AI Act.

The AI Omnibus has postponed the application of the rules governing high-risk AI systems until 2 December 2027, while the rules applicable to high-risk AI systems embedded in regulated products will apply from 2 August 2028.

The AI Omnibus also introduces new prohibitions targeting AI systems that generate non-consensual sexually explicit content and child sexual abuse material (CSAM). These prohibitions will take effect on 2 December 2026.

Greece's New AI Framework: Key Pillars of Law No. 5321/2026

The transition from Law No. 4961/2022 to Law No. 5321/2026 marks Greece's shift from an autonomous national effort to regulate artificial intelligence towards alignment with Regulation (EU) 2024/1689 (EU AI Act). The new law revises the existing framework and replaces fragmented regulations with a coherent, risk-based supervisory system.

The four key pillars of Law No. 5321/2026 are as follows:

- Governance & Supervisory Authorities: The Hellenic Data Protection Authority (HDPA) assumes a central role as the primary Market Supervisory Authority and the Single Point of Contact with the EU, while the Hellenic Telecommunications and Post Commission (EETT) is designated as the Notifying Authority.
- Innovation & Regulatory Sandbox: The AI Regulatory Sandbox is established under the EETT, the Hellenic Data Protection Authority (HDPA), and the "FAROS AI Factory", allowing for the safe testing of high-risk systems in a controlled or real-world environment.
- Transparency in the Public Sector and Rights: The Public Sector AI Systems Registry is reformed, while a Unified Complaint Submission System is established within the Hellenic Data Protection Authority (HDPA) to protect citizens from arbitrary or non-transparent algorithmic decisions.
- Stricter Framework for Deepfakes: Strict penalties are introduced for the synthetic production of content, including the removal or falsification of mandatory transparency labels. Law No. 5321/2026 also provides for the publication of imposed sanctions, the nature of the violation, and the identity of the violator, significantly increasing the reputational risk for companies that breach transparency requirements.

Consumer Protection Notes

EU Withdrawal Button 2026: Requirements, Scope, Implementation



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In accordance with Directive (EU) 2023/2673, Greece enacted Law No. 5317/2026 on 8 July 2026. Article 69 of the new Law introduces Article 3za to Law No. 2251/1994, updating the national consumer protection framework by establishing specific technical and legal requirements for exercising the right of withdrawal through digital interfaces (the "Withdrawal Button").

Scope of Application:

The New Law applies to traders concluding distance contracts through digital platforms, including websites, e-shops, customer portals and mobile applications as well as to non-EU entities targeting consumers in Greece or the EU, provided the contract is subject to a statutory right of withdrawal.

Three cumulative conditions must be met:

a) the contract is concluded via a digital interface;

b) the transaction is B2C (Business to Consumer), and

c) the specific contract or goods are subject to a statutory right of withdrawal and do not fall within the applicable statutory exemptions.

Core requirements of Article 3za Law No. 2251/1994:

- Button Labeling: The button must use unambiguous wording, such as "Withdraw from contract here" or the relevant official national translation. Generic terms such as "Cancel", "Contact", or "Service request" do not comply with the requirement.
- Placement & Visibility: The withdrawal function must remain continuously available and prominently accessible, for example through the footer or main navigation, throughout the entire 14-day withdrawal period.
- Mandatory Two-Step Process:
    - Step 1 - Input: Only essential identification data, such as name, order ID and email address, may be requested. Requiring a justification or reason for withdrawal is prohibited.
    - Step 2 - Confirmation: A separate final confirmation button labelled "Confirm withdrawal" is required. Single-step generic web forms do not comply with this requirement.
- Immediate Acknowledgement of Receipt: An automated confirmation must be sent immediately to the consumer on a durable medium, such as email, stating the exact timestamp and the details submitted.

- Timely Exercise of the Right: The declaration is deemed timely if submitted before the expiry of the withdrawal deadline, irrespective of when it is processes by the trader.

Consequences of Non-compliance:

- Civil & Administrative Remedies: Non-compliance may give rise to cease-and-desist measures, injunctions initiated by consumer bodies or competitors, and administrative fines up to €50,000 or up to 4% of annual turnover under the Omnibus enforcement rules for cross-border infringements.

- Extension of the Withdrawal Period: Failure to properly provide the required withdrawal mechanism may extend the consumer's right of withdrawal by up to 12 months and 14 days.

Insolvency Notes

EU Insolvency Harmonization Directive: Avoidance Actions (Titles II), Directive (EU) 2026/799 of 30 March 2026.

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Title II of Directive (EU) 2026/799 (the "Directive") introduces the European Union's first harmonized regime for avoidance actions, requiring Member States to render detrimental pre-insolvency legal acts void, voidable or unenforceable under three specific grounds.

First, preferential transactions (Art. 7) perfected within three months prior to the insolvency request are avoidable on an objective basis where the debtor was unable to pay its debts as they fell due; where the claim was satisfied "as owed" (congruent coverage), avoidance additionally requires that the creditor knew of that inability to pay, whereas "incongruent coverage", such as premature payments, unusual means of payment, after-the-fact collateralization, or waivers of legal defenses, is caught without that knowledge requirement. Second, transactions for no or manifestly inadequate consideration (Art. 8) carry a 12-month look-back period, subject to a carve-out for gifts of symbolic value. Third, transactions intentionally detrimental to the general body of creditors (Art. 9) reach back two years, provided the counterparty knew of the debtor's intent to cause that detriment. Across all three grounds, a rebuttable presumption of knowledge applies where the counterparty is a "party closely related to the debtor", a broadly defined category covering family members, persons with access to non-public information about the debtor's affairs, and, for corporate debtors, directors, controlling shareholders, and persons performing equivalent functions.

On consequences (Art. 10), any beneficiary of a void, voidable or unenforceable act must return the benefit obtained or its monetary equivalent, and this obligation may never be offset against the beneficiary's own claims in the insolvency proceedings; critically, a beneficiary who knew of the circumstances grounding the avoidance action (i.e., acted in bad faith) is barred from invoking the "lapse of enrichment" defense otherwise available to good-faith recipients. The claim for restitution is also fully assignable to a creditor or third party. Ordinary-course transactions performed in direct exchange for fair consideration are excluded from the preference rules, and a uniform maximum 3-year limitation period applies to all claims arising from a successful avoidance action, running from the opening of insolvency proceedings.

For Greek practice, this will require review of Articles 116 et seq. of the Insolvency Code (Law 4738/2020) against the new EU standards ahead of the January 2029 transposition deadline. Greece's regime anchors the "suspect period" to the judicially-determined date of cessation of payments rather than, as the Directive requires, a fixed three-month window counting back from the insolvency request itself (Art. 116-117), which, due to the minimum harmonization feature of the Directive, can be extended at the stage of its transposition in Greek law. The presumption of counterparty knowledge under Article 118(2) of Law 4738/2020 is also narrower than the Directive's, limited to relatives up to the third degree and specific corporate roles, against the Directive's broader "access to non-public information" test, and will most likely need expansion. Greece's shorter one-year/two-year limitation period (Art. 126) may furthermore need to be modified in light of the maximum three-year period of the Directive. Finally, the five-year look-back for fraudulent acts (Art. 119) already exceeds the Directive's minimum standards and, as a creditor-protective rule, may be retained under Article 4(1) of the Directive, without running afoul to it.

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