Decision No. 554/5/15.04.2021

Adoption of Regulation implementing measures to combat money laundering and terrorist financing to be followed by the Obliged Entities operating in the Games of Chance market under point (f) of Article 28(3) of Law 4002/2011 (Government Gazette 180/A).

INDIPENDENT ADMINISTRATIVE AUTHORITY KNOWN AS THE “HELLENIC GAMING COMISSION”

Whereas:

1. The provisions of:

a. Article 25 to 54 of Law 4002/2011 amending pension legislation for the Public Sector- Regulations for the development and consolidation of public finances- Responsibilities of the Ministries for Finance, Culture and Tourism and Labour and Social Security (Government Gazette 180/A), and in particular the provisions of Article 28(3);

b. Law 4557/2018 on the prevention and suppression of money laundering and terrorist financing (transposition of Directive (EU) 2015/849) and other provisions (Government Gazette 139/A) as amended by Law 4734/2020 amending Law 4557/2018 (Government Gazette 139/A) on the prevention and suppression of money laundering and terrorist financing- Transposition of Directive (EU) 2018/843 (L 156) into Greek Legislation and of Article 3 of Directive (EU) 2019/2177 (L 334) and other provisions (Government Gazette 196/A), and in particular point (f) of Article 6(1) and Article 6(3)(5)(6)(7) and (8);

c. Articles 16 to 23 of Law 3229/2004 on the supervision of private insurance, supervision and control of games of chance and application of the International Accounting Standards and other provisions (Government Gazette 38/A), and in a supplementary manner the provisions of Law 3051/2002 (Government Gazette 220/A) on independent authorities enshrined in the constitution and regarding the amendment and completion of the recruitment system in the public sector, and other relevant provisions;

d. Law 2206/1994 on the establishment, organisation, operation and supervision of casinos and other provisions (Government Gazette 62/A);

e. Law 3139/2003 entitled ‘Arrangements for Parnitha Casino and the Casino of Corfu and other provisions (Government Gazette 100/A);

f. Articles 357-378 of Chapter B entitled ‘Casinos licensing and operation and other provisions’ of Law 4512/2018 on arrangements for the implementation of the Structural Reforms of the Economic Adjustment Programme and other provisions (Government Gazette 5/A);

g. Law 4624/2019 on the protection of Personal Data, measures on the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and harmonization of Greek Law to Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions (Government Gazette 137/A);

h. Joint Ministerial Decision No. 56660/1679/22.12.2011 issued by the Ministers of Finance and Culture and Tourism on the Certification for commencement of operation granted to the Hellenic Gaming Commission (HGC) (Government Gazette 2910/B);

i. Decision No. 2/63389/0004/21.7.2016 (Volume of Special Position Employees and Administration Bodies of the Public Sector and the Broader Public Sector Agencies-hereinafter referred to as ‘SPEABPSA’- Issue 397) of the Minister of Finance on the appointment of Chair and two members, and the renewal of the term of members of the Hellenic Gaming Commission (Volume of SPEABPSA Issue 397) in conjunction with similar Decisions No. 2/3935/0004/24.7.2018 (Volume of SPEABPSA Issue 428) Ministry of Finance, 9433 Ministry of Foreign Affairs 2019/12.2.2019 (Volume of SPEABPSA Issue 64), 3557 Ministry of Foreign Affairs 2020/14.1.2020 (Volume of SPEABPSA Issue 20) and 145940 Ministry of Foreign

Affairs 2020/21.12.2020 (Volume of SPEABPSA Issue 1089);
j. HGC Decision No. 129/2/7.11.2014 (Government Gazette 3162/B).
2. HGC Decision No. 129/2/7.11.2014 (Government Gazette 3162/B);
3. The need to transpose arrangements for implementing measures to combat money laundering and terrorist financing to be followed by the Obliged Entities operating in the Games of Chance market into the provisions of Law 4557/2018 on the prevention and suppression of money laundering and terrorist financing (transposition of Directive (EU) 2015/849) and other provisions (Government Gazette 139/A) as amended by Law 4734/2020 amending Law 4557/2018 (Government Gazette 139/A) on the prevention and suppression of money laundering and terrorist financing- Transposition of Directive (EU) 2018/843 (L 156) into Greek Legislation and of Article 3 of Directive (EU) 2019/2177, and other provisions (Government Gazette 196/A);

4. HGC Decision No. 544/2/04.03.2021 on public consultation on the aforementioned Draft Regulation;

5. HGC Decision No. 546/1/12.03.2021 extending the time-limit prescribed for the aforementioned public consultation to take place;

6. The comments received during the public consultation on the aforementioned Draft Regulation;

7. The statement No. Π 135 ΕΞ/13.04.2021 from the Chairman of the HGC;

8. The resulting debate;

9. The fact that this decision does not entail any burden both on the state budget and the budget of the HGC, we hereby decide to:

Adopt a Regulation implementing measures to combat money laundering and terrorist financing to be followed by the Obliged Entities operating in the Games of Chance market under point (f) of Article 28 (3) of Law 4002/2011 (Government Gazette 180/A) as follows:

REGULATION IMPLEMENTING MEASURES TO COMBAT MONEY LAUNDERING AND TERRORIST FINANCING TO BE FOLLOWED BY THE OBLIGED ENTITIES OPERATING IN THE GAMES OF CHANCE MARKET.

Article 1
Definitions

For the purposes of this decision, words or phrases herewith shall have the following meaning:

Gaming Licence or Licence is the granting of a right to run Games of Chance by the Greek State to a third party in any lawful manner, irrespective of the medium, time, manner and network for the provision, marketing and distribution of the relevant services to organise and run games or the transitional character of the rights related to said organization, running and exploitation and the administrative permit issued by the HGC for conducting and/or organising Games.

Suitability Licence (SL) shall mean the decision approving a person’s suitability in accordance with the relevant provisions of the Gaming Regulation on the suitability of persons.

Senior Managing Official is either the manager or a high-ranking official who is sufficiently informed about the Obliged Entity’s exposure to money laundering and terrorist financing and participates in decision-making which affects the Obliged Entity without being necessarily a member of the Board of Directors.

Authority shall be the Authority for combating money laundering under Article 47 of Law 4557/2018 (Government Gazette 139/A);

Unusual transaction shall mean any transaction or activity that is not part of the economic operator’s or the beneficial owner’s commercial, business or professional behavior or is not consistent with their financial standing or there is no apparent economic, professional or private purpose or intention for these transactions or activities to take place.

Individual Player Card (IPC) is the card referred to in Article 33(4) of Law 4002/2011 (Government Gazette 180/A). Where this Regulation refers to the Individual Player Card, it shall also mean the Electronic Player Account and vice-versa.

Running shall mean conducting a game referred to in Article 25 (s) of Law 4002/2011 (Government Gazette 180/A). Where the provisions of this Decision refer to the concept of 'Running', this shall also cover the concept of 'Organizing' and vice versa.

HGC shall mean the Hellenic Gaming Commission.

Premises shall mean any place which is used for organizing, conducting and/or exploiting or supporting the operation of Games of Chance, irrespective of whether this place has been reported to the HGC by the Auditee or belongs to a third party.

Criminal Activity is the commitment of the predicate offences set out in Article 4 of the AML.

Compliance Report or Report shall mean all information related to the fact that the Obliged Entity should comply with the policies, checks and procedures. Said information shall be properly evaluated as set out in Article 6.

Auditee shall mean any person that is obliged to comply with the relevant Regulatory Framework.

Audit shall mean any on-site, remote and/or indirect supervisory audit conducted upon Audit Mandate with the aim of assessing whether the auditee complies with the Regulatory Framework following a standard and documented procedure in terms of methodology.

Business Relationship shall mean any business, professional or commercial relationship related to the professional activity of the Obliged Entities which upon starting time is expected to last for some time period. Indicatively, a business relationship on the part of the Obliged Entities may include the opening of an Electronic Player Account, the issuing of an Individual Player Card as well as the conclusion of agreements with relevant entities so as to be part in the Physical Network/Network.

Casino business shall mean any legal entity which holds a casino licence including cruise ship casinos referred to in Article 4(2) of Law 2206/1994 (Government Gazette 62/A).

Electronic Player Account shall mean the account referred to in Article 25(o) of the Law 4002/2011 (Government Gazette 180/A). Where this Regulation refers to the Electronic Player Account, it shall also mean the Individual Player Card and vice versa, unless otherwise specified in this Regulation.

Regulation shall mean this decision.

Gaming Regulations shall mean all decisions issued in accordance with Article 29(3) of Law 4002/2011 (Government Gazette 180/A) and the relevant HGC Instructions.

Licence Holder or Holder shall mean the legal person providing services of Organizing and Running of Games of Chance and to whom a relevant Licence has been granted.

Audit Task Force is an audit body comprising members of the Gaming Body of Auditors upon decision of the HGC Chairman which is assigned to implement relevant audits.

Other Online Games refer to casino games of chance, poker and its variants, provided online and played either live or using a Random Number Generator under Article 25 (xxii) of Law 4002/2011 (Government Gazette 180/A).

Means of Payment shall mean any Transfer of Funds and may refer to credit, debit or prepaid cards, e-wallets, customized devices, cash or any other means used by the Player in order to deposit money and cash out funds in accordance with the provisions in force.

Transfer of Funds is any transaction partially carried out by a Payment Service Provider on behalf of a payer with a view of providing money to a beneficiary via a Payment Service Provider, irrespective of whether the payer's Payment Service Provider is the same person with the one of the beneficiary including a) credit transfer, b) direct debit, c) money remittance services under Law 4537/2018 (Government Gazette 84/A) and d) any transfer made by using payment cards, any sort of e-money or any other customized device presenting relevant features and functionality in accordance with the provisions in force.

Non-cooperative countries are the countries and jurisdictions set out in Article 65(3) of Law 4172/2013 (Government Gazette 167/A) as well as the countries referred to in paragraph 3 of Annex II to the AML Law.

AML Law shall mean the Law 4557/2018 on the prevention and suppression of money laundering and terrorist financing (transposition of Directive (EU) 2015/849) and other provisions (Government Gazette 139/A).

Instructions are guidelines of the circular issued by the HGC with instructions on how to implement the provisions of the Gaming Regulations and of this decision. The guidelines are binding in the Authority's dealings with citizens.

Player shall mean the natural person who lawfully participates in Games of Chance.

Gaming Activity are all data related to the participation of the Player in the Games of Chance.

Payment Services Providers are any credit institutions, payment institutions or electronic money institutions being established and lawfully operating in Greece or in any other EU or EEA member state in accordance with the relevant provisions, including their authorized representatives or branches.

Politically exposed persons shall mean the persons referred to in Article 3(9) of the AML Law.

Beneficial Owner is the person who either enjoys the benefits of ownership or exercises control over the Obliged Entity or the natural person on behalf of which a transaction or activity is carried out pursuant to Article 3(17) of the AML Law.

Agents are natural persons operating OPAP SA agencies pursuant to Law 2843/2000 (Government Gazette 219/A) and Law 4002/2011 (Government Gazette 180/A).

Staff shall mean any natural persons associated with the Obliged Entity or the entities comprising the Physical Network under any contract of employment regarding the Organisation and Conduct of Games of Chance.

Regulatory Framework shall mean all legislative and other regulatory provisions, decisions, instructions issued by the HGC, as well as the terms included in licences laying down the conditions for lawfully organizing and running Games within the territory of Greece.

Games of Chance Audit Body or Body shall be the audit body set out in Article 18 of Law 3229/2004 (Government Gazette 38/A).

Participation shall mean entering a Player's particulars/options in any Games of Chance and confirming that entry after paying the wager.

Authentication shall mean the procedure followed by the Obliged Entity to verify the Player's identity including the use of the player's personalized security credentials.

Games of Chance or Games shall mean the games defined as such by all applicable provisions and they may be run lawfully under relevant Greek Law.

Compliance Officer is the natural person assigned by the Obliged Entity to combat money laundering and terrorist financing under Article 4 who performs the duties set out in Article 5.

Suspicious transactions or activities shall mean transactions or activities for which there are suspicions or evidence that they lead or may lead to the commitment of the offences set out in Article 2 of the AML Law. Said transactions or activities may also refer to a possible involvement either of the Player or the Beneficial Owner in criminal activities based on the assessment of all data related to the player's Gaming Activity and his/her particulars such as the nature of the Gaming Activity, the Means of Payment used, the frequency, complexity and the amount of said transaction, the use of cash or not along with the Player's profession, financial standing, transactional behavior, reputation, background and all other important information related to said transaction.

Obliged Entity shall mean the person organizing or conducting Games of Chance within the Territory of Greece including the Physical Network and the casino businesses.

The Physical Network comprises the OPAP SA agencies, the land-based spots where pari-mutuel horse racing betting is carried out (lottery or not), the land-based spots where state lottery games are carried out, the State Lotteries distributors and retailers as well as the Beneficial Owners of all the aforementioned.

Article 2

Purpose - Subject-matter - Scope

2.1. The purpose and subject-matter of this decision is to establish and implement measures so that the Obliged Entities operating in the Games of Chance market prevent and suppress money laundering and terrorist financing.

2.2. The provisions thereof shall apply to the Obliged Entities and their Staff, as well as to those persons who are obliged to hold a Suitability Licence pursuant to Articles 5 and 7 of the ministerial decision No. 79305 ΕΞ 2020 "Gaming Regulation on the Suitability of Persons" (Government Gazette 3262/B).

2.3 The provisions hereof shall apply to License Holders, upon commencement of the Games of Chance, in accordance with the Gaming Regulations and the applicable provisions.

2.4 Special obligations related to the authentication and verification of the identity of the Players by the Obliged Entities, set out in the provisions of the Gaming Regulations of Article 29(3) of Law 4002/2011 (180/A) shall not be affected by the provisions of this decision.

Article 3

Obligations of the Obliged Entities

3.1. The Obliged Entities shall have the following obligations:

a. They shall design and implement policies, procedures and controls to effectively identify, mitigate and manage the risks related to money laundering and terrorist financing in the Gambling industry. To this end, factors such as the Gaming Activity in combination with the Player's profile, the type of Games conducted, the technical means and materials needed to enable the conduct of games, the distribution network of the relevant services, the structure, organization and limits of authorised transactions, the countries or jurisdictions related to Participation, Organization and Conduct of Games of Chance, and the distribution network shall be taken into account. The Obliged Entities shall document and update the risk analysis and the policies they implement and shall make them available to the HGC at the time and in the manner prescribed by the Authority.

b. They shall have appropriate risk management systems and implement procedures, depending on the degree of risk, to determine whether the Player belongs to the category of Politically Exposed Persons or he/she is a citizen of high-risk countries for money laundering and terrorist financing as identified by the European Commission or a citizen of a country that belongs to the list of Non-Cooperative Jurisdictions.

c. They shall evaluate and redefine on an ongoing basis their policies, controls and procedures, taking into account suggestions made by the Authority, the HGC and other competent authorities, the results of the internal audits and the Report specified in Article 6, as well as all developments in the relevant field.

d. They shall implement due diligence measures, in accordance with Articles 7 and 8, with

respect to the Player and the Beneficial Owner of the entities that comprise their Physical Network and shall ensure the verification and updating of their data obtained from an independent and reliable source.
e. They shall exercise continuous supervision regarding the transactions and the activity of the Players, in the context and during the Business Relationship and shall ensure that they are in line with the information and the risk profile that they have for each Player.
f. They shall appoint a Compliance Officer in accordance with Article 4 and shall ensure that they can provide all necessary resources in order to facilitate his/her performance of duties, education and training and shall also provide full and seamless access to relevant information.
g. They shall ensure that the Compliance Officer operates independently without receiving any instructions on how to perform his/her duties. In the event that they assign other duties and responsibilities to the Compliance Officer, they shall ensure that the assignment of new duties does not constitute a conflict of interest with the duties and responsibilities assumed by the Compliance Officer under the AML Law and this Regulation.
h. They shall establish and operate an independent internal audit service to monitor the implementation of internal policies, preventive measures and procedures, and ensure compliance with the provisions of the AML Law and of the Regulation:
i. They shall lay down and implement methods and procedures for checking suitability of the Staff they employ.
j. They shall provide for the education and training of their employees and their associates whose responsibilities and tasks are related to the combat of money laundering and terrorist financing in the Gambling industry.
j(a). They shall establish procedures that allow employees and their associates to make internal reports on infringements through a special, independent and anonymous channel, commensurate with the characteristics and size of the respective Obliged Entity and shall take the necessary measures to protect said persons in accordance with the obligations specified in Article 26 of the AML Law.
j(b). They shall examine under close scrutiny and evaluate validity of any complaint, either anonymous or not, regarding matters relating to the conduct of Suspicious or Unusual Transactions for specific Players, as well as for third parties associated or allegedly associated with such Players.
j(c). They shall immediately report to the Authority when they have knowledge or significant evidence or suspect that funds, irrespective of their amount, constitute proceeds derived from or related to terrorist financing. This obligation shall also apply in any case of attempted Suspicious Transaction.
j(d). They shall provide without delay to the Authority, the HGC and other public authorities responsible for combating money laundering or terrorist financing, upon request, with all necessary information and data.
j(e). They shall refrain from any transactions for which they have knowledge or significant evidence or suspect that they are related to products derived from criminal activities or are connected with the financing of terrorism, unless they complete all necessary actions provided for in point (a) of Article 22(1) of the AML Law in order to comply with the Authority's instructions. In case they are unable to avoid carrying out said transactions or such avoidance may hinder all efforts to prosecute said beneficiaries, they shall inform the Authority immediately shortly after the transaction is performed.
j(f). They shall keep records and data in printed and/or electronic format, pursuant to Article 11.
j(g). The Player's personal data is processed in order to prevent money laundering and terrorist financing, in accordance with section 31 of the AML Law.
3.2. The Obliged Entities belonging to the same group, in addition to the obligations specified in paragraph 3.1, shall be also subject to the obligations referred to in sections 36 and 38 of the AML Law.

Article 4

Compliance Officer

4.1 The Obliged Entity shall appoint a Compliance Officer who shall have the necessary qualifications and skills to perform the duties defined in Article 5.

4.2 In the case of a group in which more than one Obliged Entity is involved, a Coordinator Compliance Officer shall be also appointed at group level. In this case, the Coordinator Compliance Officer shall assume the task of coordinating the actions of the Compliance Officers of all the Obliged Entities of the group and shall exchange all relevant information with them, where necessary. Where a Coordinator Compliance Officer is appointed at the Group level, the provisions of sections 36 and 38 of the AML Law shall apply.

4.3 Before said appointment takes place, the person that the Obliged Entity chooses to appoint as a Compliance Officer must be holder of the relevant Suitability Licence granted by the HGC, in accordance with Decision No. 79305 ΕΞ 2020 entitled "Enactment of Gaming Regulation on the Suitability of Persons" (Government Gazette 3262/B) issued by the Minister of Finance.

4.4 The Obliged Entity shall notify the HGC without delay of the decision to appoint the Compliance Officer.

4.5 In case the Compliance Officer disappears or needs to be replaced for any reason, the relevant provisions of Decision No. 79305 ΕΞ 2020 entitled "Enactment of Gaming Regulation on the Suitability of Persons" (Government Gazette 3262/B) issued by the Minister of Finance shall apply.

4.6 In the event that the Compliance Officer does not speak Greek, the Obliged Entity shall appoint a representative so that the Compliance Officer communicates with the HGC and the competent authorities, for the purpose of implementing the AML Law and this Regulation.

Article 5

Duties and Responsibilities of the Compliance Officer

The Compliance Officer shall:

a. Identify and analyze the risks associated with money laundering and terrorist financing in relation to factors such as structure, nature and specific rules of conduct, Player's profile, Gaming Activity, type, frequency, value, methods and means of transactions, countries or geographical areas of origin/destination of the players, distribution network of the services provided, expected origin and destination of the funds, etc.

b. Design and coordinate policies and procedures for the prevention, management and mitigation of identified risks and shall ensure that the extent of the measures applied on a case-by-case basis by the Obliged Entity is commensurate with the level of risks related to money laundering and terrorist financing offenses.

c. Monitor implemented policies, procedures, measures and workflows, and ensure that they are implemented in a consistent manner. The Compliance officer shall also evaluate effectiveness of said policies, procedures, measures and workflows and shall recommend to the administration of the Obliged Entity any adjustment needed regarding policies, procedures, flows and measures as well as the undertaking of all necessary corrective actions, taking into account the recommendations of the Authority, the HGC and other competent authorities, and all developments in the relevant field.

d. Collect and analyze information on transactions and Gaming Activity and compile and classify trading and gaming patterns.

e. Create appropriate channels for the flow of information and the management of complaints and report on issues related to countering money laundering and terrorist financing. The Compliance Officer shall also ensure that the Obliged Entity receives and implements all necessary measures to protect the persons referred to in Article 26 of the AML Law.

f. Collect, examine, cross-check and evaluate information received in order to verify if any Suspicious or Unusual Transactions or Activities, in relation to corporate policies, have been carried out or attempted to be carried out or if there is relevant evidence to prove said transactions and shall also keep a relevant record.

g. Inform the Authority without delay, on his/her own initiative, when he/she have knowledge or significant evidence or suspect that the transactions carried out or attempted to be carried out, irrespective of their amount, constitute proceeds derived from criminal activities or are related to the financing of terrorism, by submitting a complete and detailed report. This obligation shall also apply in any case of attempted Suspicious Transaction. In case of submitting a report, the Compliance Officer shall act as the first point of contact with the Authority both at the beginning and throughout the investigation of the case and respond to all questions and clarifications requested, in full cooperation with the Authority.
h. Provide upon request all information and data required without delay to the Authority, the HGC and any other public authority responsible for combating money laundering or terrorist financing.
i. If, after the evaluation of the information, the Compliance Officer deems that there is no need to make a relevant report, he/she closes the case with a reasoned decision.
j. Submit to the HGC and to the Administration of the Obliged Entity a Compliance Report as provided for in Article 6.
k(a). In case the Player requests from the Obliged Entity the issuance of a certificate of winnings referred to in Article 16, the Compliance Officer is obliged to check the transactions carried out with the Player concerning the time period when said attestation or certificate was requested and to verify that said transactions are not related to money laundering or terrorist financing in a direct or indirect manner. In case there is evidence to the contrary, the Compliance Officer may decide not to issue the attestation or certificate of winnings and submit a relevant report to the Authority.
k(b). Make proposals to the Obliged Entity and shall also provide education and training programs to the staff related to issues on combating money laundering and terrorist financing.
k(c). Be responsible for the communication of the Obliged Entity with the HGC, the Authority and any other competent authorities for issues related to his/her own responsibilities.
k(d). In the case of a group, he/she shall cooperate and exchange information with the Coordinator Compliance Officer and the Compliance Officers employed by the other Obliged Entities of the group.

Article 6
Compliance Report

6.1 The Compliance Officer shall submit to the Obliged Entity and the HGC a Compliance Report in accordance with the provisions set out in the AML Law and this Regulation, until the 15 July for the first half of each year and until the 15 January of the following year for the entire previous year, irrespective of the time when he/she was appointed or the time of the commencement of the business activity of the Obliged Entity in Greece. Said Report shall include detailed information on the following, as a minimum:
a. The due diligence measures, policies and procedures implemented;
b. The audits performed as well as the evaluation of the relevant results;
c. The deficiencies and weaknesses that were identified regarding the procedures followed to identify and assess Suspicious and Unusual Transactions, as well as the reports/recommendations that may have been submitted so that the Obliged Entity can take corrective measures and relevant actions;
d. The number of Players whose details were not verified and the amounts that these Players paid for their Participation in the Games of Chance;
e. The number of transactions that did not take place or were permanently terminated due to non-compliance of the Players with the requirements for the implementation of due diligence measures;
f. The number of High-Risk Players who performed transactions, based on the criteria for inclusion of Players in this category, as well as the amount of the aforementioned transactions;
g. The number of cases that were checked and filed, with reference to the justification for their

filing;
h. The training and briefings attended by the Compliance Officer and their content;
i. The number and content of the training programs organized, the number and position of the Staff members who attended them, the measures taken to inform the Staff on the AML Law and the Regulation and the evaluation of said results.
6.2 The administration of the Obliged Entity shall evaluate the Report and submit to the HGC its views within forty-five (45) days from its submission.
6.3 Upon HGC Instructions, further content may be updated and/or added to the Report of this Article, and any other specific details for the application of this article may be regulated.

Article 7
Due diligence measures

7.1 In order to comply with the requirements set out in this Regulation, the Obliged Entities shall apply, as the case may be, both standard and enhanced due diligence measures.
7.2 Standard due diligence measures shall include the following:
a. Authentication and verification of the identity of the Player based on documents, data or information obtained from reliable and independent sources, at the time specified in the Regulation, including, where available, the means of electronic identification, the relevant trust services, as provided for in the Regulation (EU) 910/2014 of the European Parliament and of the Council of 23 July 2014 as well as in Article 49 of the Code of Digital Governance of Law 4727/2020 (Government Gazette184/A).
b. Checking the identity of the Player as to whether he/she is a citizen of a high-risk country for money laundering and terrorist financing as identified by the European Commission or is a citizen of a country belonging to the list of Non-Cooperative Jurisdictions, or whether he/she is on relevant records kept by the Authority, the competent police, administrative and judicial authorities, where these records exist and are accessible by the Obliged Entities, as well as to the registers of the HGC related to restrictive measures.
c. Checking the identity of the player in order to verify that he/she is not a Politically Exposed Person. In the event that it is established that the Player is a Politically Exposed Person, the relevant provisions set out in paragraph 8.10 of this Regulation shall apply.
d. Verification and/or updating of the Player's data, in case the Obliged Entity finds either a change or lack of information/data about a Player, or that a significant transaction as provided for in the Regulation has taken place, or a change in the transactional behavior and/or in Gaming Activity of the Player.
e. Ensuring that payouts that are above the limits set out by the Regulation, as the case may be, are made only through Payment Service Providers, after authentication and verification of the Player's data as well as after verification that the Player is the beneficiary of the relevant payment account.
f. Issuing an attestation or certificate of winnings, based on the terms and procedures provided for in this Regulation.
g. Refusing to provide services, payment of winnings and to issue an attestation or certificate of winnings, in case conditions of authentication and verification of the identity of the Player have not been met, as well as in case they have knowledge or significant evidence or suspect that through his/her Gaming Activity, the Player aims at money laundering or terrorist financing.
7.3. Enhanced due diligence measures shall include the following:
a. Collection of additional information about the Player, the origin of the funds and the source of wealth.
b. Approval by a Senior Managing Official for the commencement or continuation of the Business Relationship with the Player.
c. Strengthening supervision of the Business Relationship by thoroughly examining the Gaming Activity and transactions that take place during said Activity and increasing the number and frequency of the relevant audits in order to ensure that transactions are in line with the

information that the Obliged Entity keeps about the Player, his/her professional activities, trading and gaming patterns, the technical means and means of payment he/she uses and in general his/her risk profile.
d. Adoption and application of strong methods to authenticate the Player's date, to the extent technically feasible.

Article 8
Implementation of due diligence measures by the Obliged Entities

8.1. Obliged Entities shall apply due diligence measures in a consistent and systematic manner, in accordance with the provisions set out in the AML Law and in this section, taking into account the risk related to money laundering and terrorist financing.
8.2. The Obliged Entities shall assess the degree of risk related to money laundering or terrorist financing, based on the information and data they keep about the Player, his/her trading and Gaming Activity, the type of Suspicious or Unusual Transactions performed in the Gambling industry as indicatively set out in Annex III to this Regulation and taking into account the potentially higher risk factors referred to in Annex II to the AML Law.
8.3. Depending on the degree of risk, the Obliged Entities shall apply appropriate due diligence measures referred to in Article 7 or enhance the degree, intensity and extent of measures already in place and/or impose additional measures, adapting accordingly the way transactions and Gaming Activity are monitored.
8.4. The due diligence measures may be applied in all phases and stages of the transactions carried out between the Obliged Entity and the Player (deposit, participation, credit, withdrawal of winnings).
8.5. Said measures shall apply to both new and existing Players, at the appropriate time depending on the risk and in all cases where there are doubts about the accuracy and completeness of the information provided by the Player or where information relating to the Player is modified or where the Obliged Entity should contact the Player for the purpose of updating the information related to him/her.
8.6. Any restrictions, prohibitions or refusal to carry out the transactions imposed by the Obliged Entity on the Player should be applied as soon as possible and within a reasonable time limit so as to prove that the Obliged Entity has taken all appropriate measures in a timely manner.
8.7. The Obliged Entities shall ensure that they are able –at any time they are asked to- to justify and prove to the HGC and any competent authority that the type and extent of the measures they have taken are proportionate to the risk, and that they implement said measures in a consistent and effective manner.
8.8. The Obliged Entities shall apply appropriate due diligence measures, adjusting the intensity and extent of said measures to the degree of risk and based on the corporate policies, information and procedures they develop and implement, irrespective of the transaction limits set out in this Regulation.
8.9 The Obliged Entities shall enhance the intensity and extent of the due diligence measures, taking into account the risk, based on the Gaming Activity and in combination with the Player's profile and other information they already have, when:
a. A transaction of EUR 2,000 or higher is carried out, during Participation in Games of Chance, or when receiving the winnings or in both cases, irrespective of whether the transaction is carried out in a single operation or in several operations which appear to be linked. The concept of transaction encompasses any act of purchase or redemption of vouchers, tokens and chips as well as Transfer of Funds. Fulfillment of the above limits shall be estimated at a gaming day level, which in turn, for the purpose of applying this Regulation, shall be estimated on the basis of the operating hours of the Obliged Entity and the Physical Network. In order for the Obliged Entity to determine whether a Player has complied with the above limit or not, it shall not take into account winnings which the Player has not received or have not been withdrawn from the Electronic Player Account and which are placed back for the Participation of the Player in the

Games of Chance (revolving winnings). In any case, the Obliged Entity shall prove that it applies appropriate methods, procedures and practices to determine the efforts made not to exceed the aforementioned limit through multiple transactions in a systematic and in the most objective manner.
b. The Gaming Activity and the Player's related patterns are significantly different and not in accordance with his/her trading profile and/or -as objectively defined as possible- his financial strength, based on the data and information the Obliged Entity has for the Player or the Player follows practices which based on the list of Suspicious or Unusual Transactions of Annex III and/or on common knowledge and experience, are related to an attempt made to money launder and finance terrorism in the Gambling industry.

8.10 The Obliged Entities shall apply appropriate, as the case may be, enhanced due diligence measures in all cases where:

a. They have knowledge or evidence, information or data that a Suspicious or Unusual Transaction is carried out or is attempted to be carried out.

b. They have knowledge, evidence, information or data that:

aa. the Player participates in the Games of Chance as an interposed person within the meaning of Article 32(6) of Law 4002/2011 (Government Gazette 180/A), or

bb. Participation in Games is carried out in such a manner that is considered to be collusion between two or more Players and/or is carried out with the intention of infringing the rules based on which games are conducted and/or with the intention of manipulating the outcome of the Game, or

cc. the Player or his/her relatives or any other person that has a close relationship with the Player are influenced as far as the outcome of a betting event is concerned or there are doubts about the full integrity of this betting event, or

dd. the Player has carried out or attempted to carry out Transfer of Funds to third parties, natural or legal persons and/or uses Means of Payment which belong to third parties.

dd. the Player has proceeded or has attempted to proceed to actions relating to the Transfer of Funds to third parties, natural or legal persons and/or uses Means of Payment which belong to third parties.

c. The Player is a citizen of a high-risk third country as identified by the European Commission for money laundering and terrorist financing or citizen of a non-cooperative country. Should this be the case, countermeasures should be taken to authenticate and verify the Player's identity according to identifying information or data obtained from an independent credible source including, where available, electronic identification means, relevant trust services as set out in Regulation (EU) 910/214 of the European Council and of the Council of 23 July 2014, and in Article 24 of the Code of Digital Governance- Law 4727/2020 (Government Gazette 184/A).

d. The Player is a Politically Exposed Person under the AML Law. In the case where the Player is no longer deemed a Politically Exposed Person, the Obliged Entities should take into account, for a time period of at least one (1) year, the fact that said person continues to be at risk so they are obliged to take appropriate countermeasures until they decide that said person no longer faces this particular risk.

e. The Player is registered in the list of non-licensed providers specified in Article 48(7) of Law 4002/2011 (Government Gazette 180/A).

f. The Player requests to conclude a written agreement based on which the Obliged Entity shall accept Participation in the betting game with the expected value being higher than the highest betting payout per wager under Decision No. 79835 ΕΞ 2020/24.7.2020 (Government Gazette B' 3265) issued by the Minister of Finance.

g. In case of casino businesses, the Player may request that the Obliged Entity provides the means of financing the Player's participation in the games pursuant to Article 378(26) of Law 4512/2108

(Government Gazette 5/A).

8.11. With the exception of the Games conducted by Casino Businesses and in cases where it has been demonstrated that the level of risks related to money laundering or terrorist financing are low, upon relevant decision of the HGC which shall be notified to the Commission, certain Games and/or some of their categories may be exempted from certain or all the requirements set out in this Regulation. Said exemptions should be documented by a particular risk assessment which shall examine all factors related to the Games in question and shall include, but not limited to, the average consumption expenditure for said Participation, the number, amount and frequency of payouts per winning category, the rules of the game, the way outcomes are produced, the distribution network of such services, the Means of Payment, and they shall also take into account how vulnerable relevant transactions are etc. Final assessment shall be based on the results of relevant reports conducted by the Commission within the framework of supranational risk assessments.

8.12 Where the Obliged Entity notes that appropriate due diligence measures cannot be applied, it shall refuse to carry out transactions, shall not enter into any Business Relationship or shall terminate the already existing Business Relationship and examine whether it should report to the competent Authority. The aforementioned requirements shall not impede the Obliged Entity from creating a provisional Electronic Player Account pursuant to Article 13 of the Regulation.

Article 9

Implementation of due diligence measures by third parties

9.1 Obliged Entities may rely on third parties for authentication and verification of the Player's identity, information collection and transaction assessment, as provided for in Article 19 of the AML Law. The responsibility for the performance of such obligations still lies with the Obliged Entity.

9.2 For the purposes of the implementation of this article, credit institutions and e-money institutions which, in the context of their Business Relationship with the Player, have already applied the required due diligence measures regarding the Player are deemed as the only acceptable third parties.

9.3 Obliged Entities relying on third parties shall make sure to:

a. Receive from the third party all information obtained on the Player by such third party, while applying due diligence measures regarding the Player.

b. Upon request of the Obliged Entity, third parties shall immediately transmit, in paper or electronic format, documents and data regarding the check, authentication, and verification of the Player's identity, including, where available, electronic identification means, related trust services, as provided for by Regulation (EU) 910/2014 of the European Parliament and of the Council of 23 July 2014, and by Article 49 of the Code of Digital Governance of Law 4727/2020 (Government Gazette184/A) or any other secure identification procedure, remote or electronic one, obtained by the third party during the application of due diligence measures.

9.4 In case that Business Relationship between the third party and the Player is terminated for any reason, the Obliged Entity shall proceed itself in the verification of the Player's identity and shall apply due diligence measures set out in Article 8 on a case-by-case basis.

Article 10

Reporting - Prohibition of disclosure

10.1. Obliged Entities shall immediately report to the Authority when they have knowledge or evidence or suspect that funds, regardless of the amount involved, are the proceeds of criminal activity or are related to terrorist financing. This obligation shall also apply for any case of Suspicious Transaction attempt.

10.2. Examples of types of Unusual or Suspicious Transactions are included in Annex III to the Regulation.

10.3. Obliged Entities, their Staff, and any third parties that may have knowledge due to their relationship with the Obliged Entity, may not disclose to the Player involved or to third parties that data have been or will be transmitted to competent authorities or that information has been requested or that an investigation has been or will be initiated concerning criminal offences referred to in the AML Law. The sharing of information on Suspicious or Unusual Transactions is allowed among Obliged Entities being part of the same group and having their registered offices in Greece or another EU Member State or a third country which imposes requirements at least equivalent to those of the AML Law.

10.4. Should the Obliged Entity refuse to carry out the transaction or decide to terminate the relationship with the Player, the Obliged Entity shall take all possible measures so that it is not disclosed to the Player that the reason why the transaction was denied or the relationship was terminated is that the Obliged Entity has knowledge or evidence or suspects that Suspicious or Unusual Transactions were conducted or attempted.

Article 11 Record-keeping

11.1. Obliged Entities should keep, in paper and/or electronic format, at least the following for purposes of prevention, detection, and investigation by the Authority, competent or other public authorities, of possible money laundering or terrorist financing:

a. documents and information required for compliance with due diligence obligations, including, where available, information obtained through electronic identification means, related trust services, as set out in Regulation (EU) 910/2014 (L 257), or through any other secure identification procedure, remote or electronic one, regulated, recognised, approved, or accepted by the EETT (Hellenic Telecommunications and Post Commission).

b. original documents or copies of documents necessary to identify transactions carried out with the Player, among which are also those concerning the transaction type and amount and the means of payment.

c. internal documents concerning approvals, conclusions or proposals for cases of Suspicious or Unusual Transactions investigated, irrespective of whether a report was submitted to the competent Authority or not,

d. data regarding Gaming Activity and gaming patterns,

e. data of reports submitted to the Authority,

f. correspondence with Players and third parties involved,

g. data of cases checked and closed,

h. data of complaints and petitions submitted,

i. statistics showing classification, categorisation, and historicity of sizes, degree of danger per Player and actions taken regarding everything mentioned from i. to viii.

11.2. In addition to the above:

a. Obliged Entities which carry out Games via an Electronic Player Account shall keep transaction records of Transfer of Funds per Player, for sums of EUR 5,000 or higher, per transaction.

b. Casino Businesses shall keep a transaction record for winnings payment in cash for sums of EUR 5,000 or higher, per transaction, as well as a record for payment in chips in the name of the customers for chip payment of a value of EUR 5,000 or higher, per transaction.

c. Obliged Entities which carry out Games through a Physical Network shall keep a transaction record for winnings payments for sums of EUR 2,000 or higher per transaction.

11.3. Subject to Article 30(5) of Law 4002/2011 (Government Gazette 180/A), Obliged Entities shall retain documents and data related to compliance with the obligations of the AML Law and of the Regulation, in paper and/or electronic format, for a period of five (5) years following the termination, in any way, of the Business Relationship with the Player.

11.4. Upon expiry of the period for keeping the aforementioned files, Obliged Entities shall delete personal data, unless retention for a longer period is allowed or imposed by another provision of law or regulation. Such period may not be longer than a decade.

11.5. Data, information, and records shall be kept in such a way and format as to allow the Obliged Entity to respond fully and without delay to requests of the HGC, the Authority, or another public authority, which is also competent, so that such data, information and records are provided in time-limits specified by such authorities.

11.6. The HGC shall decide whether more transaction categories are to be added, as well as data that Obliged Entities are obliged to keep. Money and time limits for retention of data may be increased or decreased, and all other more specific details for the implementation of this article may be regulated.

Article 12

Processing of Personal data

12.1. Personal data processing, in the implementation of this article in order to prevent money laundering and terrorist financing, is considered to be a matter of public interest in accordance with Regulation (EU) 2016/679, Regulation (EU) 2018/1275 and Law 4624/2019 (Government Gazette 137/A).

12.2. Personal data processed by Obliged Entities only in order to prevent money laundering and terrorist financing, in accordance with the AML Law and the Regulation, may not be used or processed for other purposes, unless necessary so that Obliged Entities can comply with their obligations as provided for in the Gaming Regulation and in HGC decisions and Instructions related to matters regulated by the Gaming Regulation.

12.3. Obliged Entities shall provide to potential customers information required, in accordance with Article 13 of the Regulation (EU) 2016/679, through which they shall provide general information on the obligations of the Obliged Entities, in accordance with the AML Law and the Regulation, concerning processing of personal data to prevent money laundering and terrorist financing.

12.4. Pursuant to the prohibition of disclosure provided for in paragraph 10.3, it is permitted to limit, in whole or in part, the subject’s right of access to personal data concerning such subject, in cases that Obliged Entities, the Authority, the HGC, other competent authorities, and controllers of the aforementioned, perform their duties for the purposes hereof in such a way as not to obstruct investigations, analyses or procedures and to make sure that prevention, investigation, and detection of money laundering and terrorist financing shall not be jeopardised, as provided for in Article 31(1) and in Article 32(1) of Law 4624/2019 (Government Gazette 137/A).

Article 13

Authentication and verification of the identity of the Player participating in games of chance conducted via an Electronic Player Account

13.1. Obliged Entities which conduct Games of Chance via an Electronic Player Account shall authenticate and verify the identity of every new Player as follows:

a. They shall authenticate and verify the Player’s identity, as provided for in this Regulation, and they shall make sure that the Player is the same person as the one the Player claims to be. Examples of verification methods are described in Annex I to the Regulation which forms an integral part of this Regulation. Where there is doubt about the sufficiency of information regarding the Player’s identity, they shall ask for additional details.

b. They shall create and hold, exclusively, Electronic Player Accounts which show the Player’s full name according to the identification documents.

c. They shall enter as Players only natural persons acting in their own name and on their own account, provided that the data declared on the application are the same as those contained in the ID card or passport or another equivalent document.

13.2. Collection of necessary data and documentation for the authentication and verification of the identity of a new Player shall be performed within thirty (30) days after the creation of the Electronic Player Account. Until the expiry of the aforementioned deadline, the Account is provisional.

13.3. If the deadline mentioned in paragraph 13.2 expires and the Player’s identity is not verified, Obliged Entities shall:

a. set the Electronic Account in “Blocked” status and cease to accept any transactions with the Player.

b. inform the Player of the “Blocked” status of the Electronic Player Account and set a deadline of thirty (30) days after the “Block” date so that the Player can proceed in necessary actions and present the required data for the authentication and verification of the Player’s identity. If the Player presents the data required, they shall activate the Electronic Account and finalise the Business Relationship. If no action is taken within the aforementioned deadline or if the data presented are still insufficient, they shall close the Electronic Account and terminate the Business Relationship.

13.4. For the period during which the Electronic Player Account is provisional as provided for in paragraph 13.2, Obliged Entities shall:

a. allow the Player to make deposits in the Electronic Player Account, of up to EUR 800, whether this amount is covered by one transaction or by several transactions.

b. allow the Player to Participate in betting on events scheduled to take place until the 30th day following the Player’s Electronic Account creation date or in online games held during the same period. Betting on events postponed until after the 30th day following the Electronic Account creation date is arranged at 1.00 odds.

c. credit the Electronic Player Account with winnings deriving from the Player's Participation in the Games.

d. not allow the Player to cash out any deposits and winnings credited to the Electronic Player Account.

13.5. For the period during which the Electronic Player Account is “Blocked” as provided for in paragraph 13.3, Obliged Entities shall not allow Participation and any action of Transfer of Funds from and to the Electronic Player Account.

13.6. If the Electronic Player Account is closed as provided for in paragraph 13.3, Obliged Entities shall arrange again all Participations that made profit to the Player during the whole period that the Account was provisional at 1.00 odds. Subject to paragraph 13.7 (d), they shall pay to the Player the remaining capital credited to the Electronic Account as provided for in Article 21(2) of the Decision 79835 ΕΞ 2020/24.7.2020 (Government Gazette 3265/B) of the Minister of Finance, and they shall examine if they should report to the Authority. Participations that did not yield any profit shall not be reimbursed.

13.7. Throughout the Business Relationship, Obliged Entities that carry out Games through an Electronic Player Account shall make sure that:

a. No credits are transferred among Electronic Player Accounts.

b. Transfers of Funds from and to the Electronic Player Account are obligatorily performed via Payment Service Providers.

c. Deposits in the Electronic Player Account of sums of EUR 5,000 or higher per transaction shall be accepted and used for Participations only if it has been confirmed that the payment account declared by the Player really belongs to the latter.

d. Withdrawals to Players of sums of EUR 800 or higher per transaction may be carried out only if it has been confirmed before the transaction that the payment account declared by the Player really belongs to the latter. For payments of Players in cases of Gambling Services carried out through Video Lottery Terminals (VLT), the limits and procedures of paragraph 15.1 shall apply.

e. They shall take all appropriate organisational and technical measures so that Transfers of Funds from and to the Electronic Player Account are carried out through Means of Payment belonging to the Player. In case that it is confirmed a posteriori that a Transfer of Funds has taken place via Means of Payment belonging to third parties, they shall prohibit their use, shall reimburse the capital deposited to the beneficiary of the Means of Payment, shall not pay any winnings deriving from the use of such Means and they shall examine if there is a reason to report to the competent Authority.

13.8. The details of the Player's payment account shall be verified by relevant documentation as set out in Section A of Annex I.

13.9. In case of Online Games of Chance, only transactions with Players connected from an IP address within the Greek territory shall be carried out.

Article 14

Electronic Roaming Account

14.1. An Obliged Entity conducting Online Games of Chance in Greece (host country) may create an Electronic Roaming Account for Players visiting Greece. Such Players should have an active electronic account in a person that:

a. has a valid licence to run gambling services online, issued by a competent regulatory authority of an EU country, an EEA country, Switzerland, or the UK.

b. offers, while this licence is valid, gambling services online in a Member State of the EU or the EEA as well as Switzerland and the UK (country of origin),

c. is an enterprise affiliated to the Obliged Entity within the meaning of Annex A to Law 4308/2014 (Government Gazette 251/A) or has equity rights of a percentage equal to or higher than 10% of the Obliged Entity.

14.2. Creation of an Electronic Roaming Account shall be permitted under the following conditions:

a. The electronic account held by the Player in the person of the country of origin is active and not provisional.

b. The person of the country of origin:

aa. implements, with the required consistency and efficiency, due diligence measures, which are the same as or equivalent to those provided for in the Regulation, and has responsibilities and obligations towards competent supervisory authorities of the country of origin,

bb. makes available to the Obliged Entity all data and information regarding authentication and verification of identity as well as due diligence measures applied for the Player, in the name of whom the electronic account is held and who asks for the creation of the Electronic Roaming Account by the Obliged Entity for the period of stay in Greece.

c. The Obliged Entity and the person of the country of origin have signed and immediately communicated to the HGC a contract which:

aa. regulates the access of the Obliged Entity to the information required for the creation of an Electronic Roaming Account in the name of a player holding an electronic account in the person of the country of origin, the player's gaming activity and any other necessary information,

bb. obliges such person to provide to the HGC all data and information requested, provided to the Obliged Entity for the implementation of the due diligence measures and the creation of the Electronic Roaming Account.

d. The Player has given consent to the processing of personal data and information concerning the Player for the purpose of creating, operating, and managing the Electronic Roaming Account both by the Obliged Entity and by the person of the country of origin.

14.3. For the creation of an Electronic Roaming Account, the Player shall submit an application to the Obliged Entity, which shall serve as a solemn declaration of Article 8(4) of Law 1599/1986 (Government Gazette 75/A), that all data included in it and those accompanying it are true. At least the following is declared and submitted along with the application:

a. Full identification details of the Player (Surname, Name, Nationality, Sex, Date of Birth, Place of Birth).

b. Passport number which should have been issued by competent authorities of the country in which the Player resides permanently, or social security number in the country of permanent residence, or other equivalent identifying information based on the law of the country of origin.

c. Full permanent residence address;

d. Temporary residence address in Greece;

e. Date of arrival in Greece;

f. Country from which the Player entered Greece;

g. Gateway of entry in Greece;

h. Mobile phone number;

i. Any other data, information, or documentation that the Obliged Entity may ask for in order to authenticate and verify the Player’s identity.

14.4. The Obliged Entity shall cross-check the aforementioned details with those kept for the Player by the person of the country of origin and shall make sure that:

a. The Player that asks for the creation of the Electronic Roaming Account is the same person as the one holding an electronic account in the person of the country of origin.

b. The electronic account held by the Player in the person of the country of origin is active and not provisional.

c. The Player is not in a block status from games or in another similar status in the country of origin.

14.5. If what is mentioned above is met, the Obliged Entity shall create the Electronic Roaming Account for a period of thirty (30) days from its date of creation. The creation of an Electronic Roaming Account for the same Player is not allowed until one hundred and eighty (180) days have passed after the immediately preceding similar Account was closed.

14.6. During the period of operation of the Electronic Roaming Account, the Obliged Entity shall:

a. Allow the Participation of the Player only in games or events arranged before the expiry of the validity of the Electronic Roaming Account,

b. Allow deposits by the Player up to the amount of EUR 10,000 either in one or more transactions.

c. Accept deposits for Participations and make withdrawals to the Player only if it has been confirmed that the payment account declared by the Player really belongs to the Player. The details of the Player’s payment account shall be verified by relevant documentation or otherwise as set out in Section A of Annex I.

d. After thirty (30) days from the date of creation of the Electronic Roaming Account, the Obliged Entity shall close the Electronic Roaming Account and reimburse any balance to the Player's payment account as soon as possible and in any case within three (3) business days following the day after the closing of the Electronic Roaming Account.

e. If the Obliged Entity has knowledge or evidence or suspects that the Player's transactions are related to proceeds of criminal activities or connected to terrorist financing, the Obliged Entity shall not execute such transactions before carrying out the necessary actions set out in Article

22(1) of the AML Law and complying with the instructions given by the Authority. If the avoidance of the transaction is impossible or may impede the efforts of persecution of such beneficiaries, the Obliged Entity shall execute the transaction and immediately inform the Authority and the person of the country of origin.

14.7. The Obliged Entity shall issue a winnings certificate to Players who won money from their Participation in the Games through an Electronic Roaming Account, upon relevant request by the Player. The winnings certificate shall be issued exclusively to Players residing permanently abroad and shall mention at least:

a. The Player's details and passport number.

b. The Player's social security number or other equivalent identifying information based on the law of the country of origin.

c. The details of paragraph 16.4 (c).

14.8. Obliged Entities have the right to refuse to issue a winnings certificate to a Player who Participated in the Games through an Electronic Roaming Account when they have knowledge, evidence, information, or data that a Suspicious or Unusual Transaction was or is carried out or is attempted to be carried out. In this case, the Obliged Entity shall take care so as not to disclose to the Player the reason why the Obliged Entity refuses to issue the winnings certificate, it shall inform the person of the country of origin of the reasons why it refused to issue the aforementioned certificate, and it shall examine if there is a reason to report to the Authority.

14.9. Obliged Entities shall notify the HGC of their intention to proceed in the implementation of this article and shall submit all necessary data based on which they prove that they can create Electronic Roaming Accounts. Applicability of this article shall be proved after fifteen (15) days have passed after the aforementioned notification and on condition that the HGC has no objection or has not asked for additional information.

Article 15

Authentication and verification of the identity of the Player participating in land-based Games of Chance

15.1. Obliged Entities, when providing Games of Chance conducted on the Physical Network, other than Games of Chance conducted with an Individual Player Card, shall ensure that:

a. Payments of gross winnings to the Player, amounting to EUR 2,000 or more, per ticket, are paid exclusively through Payment Service Providers, upon verification of the Player’s identity, by presenting the Player’s ID card or passport or any equivalent document issued abroad.

b. Payments of gross winnings to the Player, amounting to EUR 1,000 and more up to EUR1,999.99, per ticket, may be paid, upon request of the Player according to the procedure referred to in point (a).

c. Transfers of Funds between the Player and the Obliged Entity shall be carried out upon identification of the Player by presenting the Player’s ID card or passport or any equivalent document issued abroad. For Transfers of Funds which amount to EUR 5,000 or more, transaction shall be executed only if it has been confirmed that the payment account declared by the Player really belongs to the latter.

15.2. Casino Businesses shall ensure that:

a. Before the Player enters the Gaming area, Casino Businesses shall receive a file with the Player’s identification data, including their name, age, home address and ID card or passport or any equivalent document and keep a copy of the document. The scope and type of documentation of the data shall be risk-based, according to the risk analysis conducted by the Obliged Entity. Examples of the methods of authentication and verification of the Player’s identity are included in Annex I to the Regulation.

b. Gross winnings payments to the Player amounting to EUR 5,000 or more, shall be made upon identification of the Player by presenting the Player's ID card or passport or any other equivalent document. These data shall be cross-checked with those kept according to point (a) stated above.

c. Transfers of Funds between the Player and the Obliged Entity shall be carried out upon identification of the Player by presenting his/her ID card or passport or any equivalent document issued abroad. For Transfers of Funds which amount to EUR 5,000 or more, the transaction shall be executed only if it has been verified that the payment account declared by the Player really belongs to him/her.

Article 16

Attestation - Certificate of Winnings

16.1. Obliged Entities who conduct Games of Chance through an Electronic Player Account shall issue, upon relevant request of the Player, a certificate of winnings before tax for the preceding financial year, for all net winnings arising on the basis of the total Gaming Activity during the reference year.

16.2. Obliged Entities who conduct Games of Chance via their Physical Network, shall issue, upon request of the Player, a certificate of winnings before tax for net winnings which amount to EUR (1,000) or more per ticket, for the preceding financial year, and for all winnings delivered either through payment orders as referred to in point (a) and (b) of paragraph 15.1 or by Transfer of Funds as stated in point (c) of the same paragraph.

16.3 Casino Businesses shall issue, upon request of the Player, a winnings certificate for the preceding financial year, and regarding net winnings which amount to EUR10,000 or more for the total winnings paid during the financial reference year. The certificate shall be issued provided that:

a. Both the Player's Participation in the Games and the confirmed winnings obtained from this Participation during the reference year can be identified and verified based on the data kept in an information system regarding the Games of Chance in which the Player had participated and according to the Participation and payment means regarding the confirmed winnings with analysis per transaction and listing of the exact time of Participation.

b. The Player's personal data have been identified and verified in accordance with Annex II attached hereto, which is an integral part thereof, as well as the payment account held by the Player to a Payment Service Provider, where required by this Regulation.

c. Appropriate risk-based due diligence measures have been applied.

16.4. Winnings certificate shall be issued exclusively to Players who have a Greek VAT number and shall state at least:

a. the Player's details and the number of the Player's ID card or passport;

b. the VAT Identification Number;

c. In distinct parts:

aa. the total amount spent by the Player for his/her Participation in the Games of Chance;

bb. the total amount of gross winnings during the reference period;

cc. the total amount of tax withheld on winnings in accordance with the provisions in force;

dd. the total amount of net winnings made during the reference period.

16.5. The certificate shall be issued only if the Player's personal data are identified and verified in accordance with Annex II to the Regulation and after all appropriate risk-based due diligence measures have been applied.

16.6. Casino Businesses shall issue, upon the Player's request, a winnings certificate for Players residing permanently abroad, who visit Greece and have declared that they are going to transfer their winnings when they leave from the country. The winnings certificate shall be issued for winnings paid to the Player exclusively in cash and their amount per transaction shall be equal to or higher than the one that is each time subject to a relevant declaration under Regulation (EC) No. 1889/2005 of the European Parliament and of the Council of 26 October 2005 (L 309/9 of 25 November 2005) on cash controls entering or leaving the European Union (L 309/9 of 25 November 2005).

16.6.1. The winnings certificate:

a. is issued for the sole purpose of documenting the Player's statement upon his/her departure from Greece.

b. proves the Player’s net winnings, during his/her Participation in the Games of Chance.

c. is not presumptive evidence of possession of realisable assets that the Player possesses when leaving the country.

d. can be used for tax purposes if accepted by the authorities of the country of origin.

16.6.2. The winnings certificate is issued where:

a. The Player's Participation in the Games of Chance as well as the winnings that the Obliged Entity certifies that he/she has obtained from said Participation during the reference period may be identified with respect to the Player and verified on the basis of the data kept in a relevant information system, with analysis per transaction and recording of the exact time of Participation, of the Games of Chance in which the Player participated and of the means of Participation and payment regarding the certified winnings.

b. The full details of the Player have been identified and verified according to the model in Annex II to this Regulation.

c. Appropriate risk-based due diligence measures have been applied.

16.6.3. The winnings certificate shall state at least:

a. The Player's details and passport number.

b. The player's social security number or another identifying information equivalent under the law of the country of origin.

c. The data of point (c) of paragraph 16.4.

16.7. The certificate of winnings has a unique validation code which shall be notified to the HGC when said certificate is issued.

16.8. Obliged Entities have the right to refuse the Player the issuing of a certificate of winnings when they have knowledge or evidence, information or data that a Suspicious or Unusual Transaction has been carried out, is being carried out or attempted to be carried out. Should this be the case, they shall not disclose to the Player the reason for refusing the issuance of the certificate of winnings and shall submit a relevant report to the Authority.

16.9. The HGC shall determine, upon relevant instructions, both the specifications and the notification procedure for communicating the validity code provided for in paragraph 16.7 as well as any specific details for the application of this article.

Article 17

Accounts notification

17.1. The Obliged Entities who conduct Online Games of Chance by submitting the application to start conducting Online Games of Chance provided for in Article 6(2) of Decision No. 79835 ΕΞ 2020 / 24.7.2020 (Government Gazette 3265/B) issued by the Minister of Finance, shall notify to the HGC:

a. Their own account and the Player account they keep in Payment Service Providers as well as the special codes of these accounts as provided for in Article 49 of Law 4002/2011 (Government Gazette 180/A);

b. The Means of Payment accepted for the deposit of the Participation fee and payouts to the

Players.

17.2. The Obliged Entities who conduct Gambling Services through Video Lottery Terminal (VLT) shall disclose to the HGC the data specified in paragraph 17.1 within thirty (30) days from the entry into force of the Regulation.

17.3. The Obliged Entities who conduct Games of Chance within the Physical Network shall notify the HGC of the accounts they hold at Payment Service Providers and the Means of Payment they use, and shall accept to deposit Participation fees and payout to the Players within thirty (30) days from the entry into force of this Regulation.

17.4. Casino Businesses shall notify the HGC of their own account, the Player account held at Payment Service Providers and the Means of Payment they use, and shall accept to deposit Participation fees and payout to the Players within thirty (30) days from the entry into force of this Regulation. The Player account that the Casino Business holds at a Payment Service Provider falls within the meaning of the bank account held by this company for the payment of winnings to Players in accordance with the provisions in force. The amounts of the Players' accounts shall be taken into account for determining the cash reserves of the aforementioned businesses.

17.5. The Obliged Entities shall confirm to the HGC the data referred to in paragraphs 17.1, 17.3 and 17.4 until 31 January of each following year. Any change in these data shall be notified to the HGC no later than fifteen (15) days from the date on which it occurred.

Article 18
Obligations of the entities comprising the Physical Network

18.1. The entities comprising the Physical Network shall:

a. apply measures and procedures based on the risk analysis and compliance policies followed by the Obliged Entity to comply with this Regulation, and in particular, regarding the process of authenticating and verifying the Player’s identity and his/her payment account, as well as the issuance of a payment order to a Payment Service Provider, where necessary. Winning tickets are not allowed to be registered to the name of third parties other than the Player.

b. monitor on an ongoing basis the transactions of their area of responsibility regarding the conduct of Suspicious or Unusual Transactions and shall also submit a relevant report to the Compliance Officer of the Obliged Entity.

c. provide for the training and the participation of the senior managing officials and the staff in specialized training programs on money laundering and terrorist financing in the Gambling industry.

d. refrain from any action that may lead to the commission or attempt to commit the offenses specified in Article 2 of the AML Law through the conduct of Games of Chance.

e. provide the Obliged Entity with all data required for the authentication and verification of the identity of their beneficial owner which they keep and shall inform without delay in any case of change.

f. The entities and the staff they employ shall not disclose to the Player or to third parties -with the exception of the Compliance Officer- that they are aware of data or information or such data and information was requested or transmitted or that an investigation is currently conducted or is to be conducted or a report for money laundering or terrorist financing of terrorism was or is to be submitted to the competent Authority.

Article 19
Compliance check

19.1. The HGC may, at any time, carry out Compliance Checks in order to verify that the Obliged Entities shall comply with the provisions laid down in the AML Law and this

Regulation.

19.2. As far as Compliance Checks are concerned, provisions laid down in Part II and Part III of Articles 13 to 21 of the Decision No. 125944 ΕΞ 2020 entitled “Gaming Regulation on Administrative Measures and Sanctions” (Government Gazette 4884/B) issued by the Minister of Finance shall apply.

19.3. The Obliged Entities, as well as their Personnel, shall facilitate in every way and at the appointed time the authorized control bodies and provide them with seamless access to all their Premises as well as to documents, data, information or any other, auxiliary data for the Audit or the compliance check.

Article 20

Compliance procedure

20.1 Upon relevant decision issued by the HGC and before imposing any administrative sanctions, compliance measures may apply pursuant to Article 51(1) of Law 4002/2011 (Government Gazette 180/A).

20.2 Compliance procedure shall be carried out pursuant to Article 3 of Decision No. 125944 ΕΞ 2020 entitled “Gaming Regulation on Administrative Measures and Sanctions” (Government Gazette 4884/B) issued by the Minister of Finance.

Article 21

Administrative measures and sanctions

21.1. In the case of breaches and failure to comply with the obligations under the AML Law and the Regulation, the HGC considering the criteria specified in Article 22 may decide:

a. to impose to the Obliged Entities a lump-sum fine of EUR 5,000 to 1,000,000 per infringement, and/or

b. to suspend temporarily and up to three (3) months or to revoke permanently the Gaming Licence granted to the Obliged Entity, and/or

c. to impose to the Staff employed by the Obliged Entity, the entities comprising the Physical Network as well as to the natural persons who have the obligation to hold a Suitability Licence pursuant to Articles 5 and 7 of Ministerial Decision No. 79305 ΕΞ 2020 entitled “Gaming Regulation on the Suitability of Persons (Government Gazette 3262/B) a lump-sum fine of EUR 1,000 to 1,000,000 per infringement, and/or

d. to suspend temporarily and up to three (3) months or to revoke permanently the Suitability Licence for natural persons who are obliged to hold a Suitability Licence pursuant to Articles 5 and 7 of Ministerial Decision No. 79305 ΕΞ 2020 entitled “Gaming Regulation on the Suitability of Persons” (Government Gazette 3262/B), and/or

e. to make the Obliged Entity and the entities comprising the Physical Network remove from their positions, either for a fixed or indefinite period, all senior managing officials and employees being responsible for said breach, and/or not allow them to assume any equivalent positions.

21.2. Any decisions imposing administrative sanctions shall be posted on the HGC website pursuant to the AML Law.

21.3. In the event of failure to successfully implement compliance procedure set out in Article 20, the amount of the fine may be increased by 20% to 50%.

21.4. In the event of repeat infringement, the amount of the fine shall be increased by 25% to 50%.

Article 22

Criteria for determining the type and level of administrative sanctions

The criteria for determining the type and level of administrative sanctions shall be as follows:

a. The degree of responsibility;

b. The number and content of the subsequent obligations the natural or legal person failed to fulfill;

c. The duration of the breach;

d. The financial strength and the benefit derived or sought to be derived by the Auditee and/or the value of any illegal transactions;

e. The extent of involvement of the persons who have the powers to represent, manage and administrate the Obliged Entity and the Physical Network in said breaches;

f. The extent of losses caused to the Greek State and the Players;

g. The repeat infringement of the AML Law and of the Regulation;

h. Any repeated non-compliance with the HGC suggestions as well as any failure to ensure compliance with the procedure laid down in Article 20.

i. Refusal of the Auditee to cooperate and any attempt to prevent both the HGC and its audit bodies from examining said case.

Article 23

Mitigating circumstances

The mitigating circumstances taken into consideration for determining the type and level of administrative sanctions shall be the following:

a. The level of cooperation of the Auditee with the HGC;

b. Whether the Auditee has taken actions to comply with the AML Law and the Regulation;

c. Whether the Auditee has taken actions to counteract the effects of the breach;

d. Whether the Auditee has taken actions to prevent future similar breaches.

Article 24 Repeated breaches

24.1. Repeat offender is any person who in a time period of two (2) years from the date when the administrative sanction was firstly imposed and after the entry into force of this decision, has committed two (2) more breaches for which he/she has been imposed a sanction.

24.2. Following two (2) years from the imposition of the sanction due to which the Auditee was deemed a repeat offender, he/she seizes to be considered as such.

Article 25

Payment of fines

25.1. Payment of fines imposed shall be made by deposit to the account held by the HGC within thirty (30) days from the date when the relevant notice of assessment was communicated to the interested party. Deposit receipt shall be the proof of payment of the fine and shall strictly state the type of fine paid and the full details of the obliged entity as payment reference. On presentation of the aforementioned document, the HGC shall issue the relevant payment receipt.

25.2. In case of failure to pay the fine within the aforementioned time-limit, the latter shall be confirmed and paid in accordance with the Code for the Collection of Depts owed to the State.

Article 26 Other provisions

Upon relevant instructions, the HGC shall specify and regulate in detail any particular technical issues that may arise for the purpose of implementing this decision other than those particularly referred to in the specific provisions thereof.

Article 27

Transitional and repealed provisions

26.1. All persons who as from the date of the entry into force of this decision provide their online gaming services in a lawful manner shall appoint within fifteen (15) days from the date when the Licence was granted a Compliance Officer pursuant to the provisions of this decision. Upon commencement of the running of the Games of Chance specified by the relevant Licence, the aforementioned persons shall comply with the provisions set out in this decision pursuant to Article 6(2) of the Decision No. 79835 ΕΞ 2020/24.7.2020 (Government Gazette 3265/B) issued by the Minister of Finance. Until the Games of Chance start to be conducted under said Licence, the Obliged Entities referred to in this paragraph shall apply the provisions set out in the HGC Decision No. 129/2/2014 (Government Gazette 3162/B).

26.2. Without prejudice to paragraph 26.3, the Obliged Entities which upon the date into force of this decision are Licence Holders shall appoint within fifteen (15) days as from the date into force of this decision a Compliance Officer pursuant to the provisions set out herein, and shall comply with these provisions starting from 1 August 2021. By 31 July, the Obliged Entities stated in this paragraph shall apply the provisions set out in the HGC Decision No. 129/2/2014 (Government Gazette 3162/B).

26.3 Casino Businesses shall apply the provisions thereof as of 1 January 2022. For this purpose, they shall appoint a Compliance Officer and forward to the HGC all measures, procedures, policies along with the risk analysis implemented in order to fulfill their obligations under the AML Law and this decision until 30 November 2021.

26.4 As of the entry into force of this decision, the HGC Decision No. 129/2/2014 (Government Gazette 3162/B) shall be repealed, unless otherwise specified in this Article.

Article 28 Entry into force

This decision shall enter into force on the date of its publication in the Government Gazette.

ANNEX I

A. LIST OF EXAMPLES OF THE MEASURES APPLIED TO IDENTIFY AND VERIFY THE DATA OF THE PLAYER FOR GAMES CONDUCTED VIA AN ELECTRONIC PLAYER ACCOUNT OR AN INDIVIDUAL PLAYER CARD

Within the framework of identifying and verifying the data of the Players during the creation of their Electronic Player Account or the issuing of their Individual Player Card, the Obliged Entity shall apply specific procedures and ensure the following:

a. All data submitted by said person correspond to information which belongs to a real person according to documents, data and information obtained from a reliable source.

b. The person whose name is used for the opening of an Electronic Account or the issuing of an Individual Player Card is the one who has applied for such registration.

c. The Player who participates in Games of Chance using an Electronic Player Account or an Individual Player Card is a real person whose data have been submitted according to the requirement set out in point (a).

To ensure compliance with the aforementioned requirements, the Obliged Entity shall:

a. Require the person applying for an Electronic Player Account or an Individual Player Card to present either his/her ID card or passport or any other equivalent document issued by the competent national authority in paper or electronic format.

b. Make a combined use of a username and a password or a Personal Identification Number (PIN), where an Individual Player Card is issued.

c. Ensure that its specialized staff is able to identify and verify the Player’s data in the latter’s physical presence.

d. Apply specific procedures and practices in order to verify the Player's data via third-party sources such as:

aa. Verification of the Player's contact details by submitting relevant evidence such as phone, electricity, water bills etc.

bb. Verification that the Player holds a payment account in his/her own name. For instance, the Obliged Entity may request the Player -upon registration- to submit the IBAN of his/her bank account and/or verify the Player's identity in a direct manner via the Payment Service Provider.

In case of withdrawals to the Player, the Obliged Entity may pay a small amount of money e.g. up to EUR 0.30 depending on the thresholds set out by the Payment Service Provider and/or verify it in a direct manner via the latter.

In case electronic submission takes place, the Obliged Entity shall contact the Player by any appropriate means such as recorded phone conversation, SMS messages, registered letter etc.

B. EXAMPLES OF TYPES OF METHODS TO AUTHENTICATE AND VERIFY THE IDENTITY OF THE PLAYER WHO PARTICIPATES IN GAMES OF CHANCE CONDUCTED ON THE PHYSICAL NETWORK OR IN CASINO BUSINESSES

Both the Obliged Entity providing Games via the Physical Network, other than Games conducted through an Individual Player Card, and the casinos shall assign their specialized staff to verify the player's physical presence. They shall also ensure that any payment of winnings exceeding cash thresholds set out in the relevant Regulation shall be made upon presentation of a valid identity document or passport or any other equivalent document issued within the Greek territory or abroad verifying, as the case may be, that the Player is the holder of the payment account stated by the latter. Casino businesses shall identify and verify the Player's data before his/her entering the place.

ANNEX II

AUTHENTICATION AND VERIFICATION OF THE IDENTITY OF THE PLAYER WHEN ISSUING A WINNINGS CERTIFICATE

A. When issuing a winnings certificate, the data required, as a minimum, to verify the player's identity, and the documents required to verify such information shall be the following:

DATA USED FOR VERIFYING THE PLAYER'S IDENTITY	EXAMPLES OF DOCUMENTS USED FOR VERIFYING THE PLAYER'S IDENTITY (IN PART OR IN WHOLE, AS THE CASE MAY BE)
Full name and father's name	Police ID Card or valid Passport Identity of the persons serving in the Security Forces and the Armed Forces. In the case where a winnings certificate is issued for Players residing permanently abroad, a document equivalent to the one mentioned above issued by the competent authority in the country of origin shall be needed.
Document Identification Number and issuing Authority	
Date and place	

of birth	
Home address and phone number	A current phone, electricity or water bill. A lease agreement submitted to the competent tax office. A Clearance Certificate or other documents issued by the competent tax office. A valid permanent residence permit for persons settled in Greece. In the case where a winnings certificate is issued for Players residing permanently abroad, a document equivalent to the one mentioned above issued by the competent authority in the country of origin shall be needed.
Profession	Certificate of Employment Tax Clearance Certificate or other documents issued by the competent tax office. A copy of a current payroll Professional ID/ Certificate issued by the General Electronic Commercial Registry ('GEMI') Documents issued by the competent Insurance Agency In the case where a winnings certificate is issued for Players residing permanently abroad, a document equivalent to the one mentioned above issued by the competent authority in the country of origin shall be needed.
Tax Identification Number Social Security Number	Tax Clearance Certificate or other documents issued by the competent tax office. In the case where a winnings certificate is issued for Players residing permanently abroad, a document or certificate issued by the competent authority in the country of origin proving the Tax Identification or Social Security number of the Player shall be needed.

B. In the case where a certificate of winnings is issued for Players residing permanently abroad, the Obliged Entities may request the translation of the aforementioned documents so as to fully understand their content.

ANNEX III
EXAMPLES OF TYPES OF SUSPICIOUS OR UNSUAL TRANSACTIONS IN THE GAMBLING INDUSTRY

A. Evidence that may be taken into account in order for a transaction or activity to be deemed unusual or suspicious shall be the following:

a. The Player is unwilling or refuses to submit the documents required to verify the Player’s identity or any other relevant document, data and information.

b. The Player presents documents whose authenticity is questionable or provides insufficient and inaccurate data and information or information which cannot be verified.

c. The Player changes his/her home address frequently, a fact that cannot be justified by his/her professional or business activity.

d. The Player’s phone line is either disconnected or does not function.

e. There is information from a third-party source (local community, mass media etc.) that either the Player or any persons related to him/her are likely to be involved in the commitment of the predicate offences specified in Article 4 of the AML Law.

f. There is information that the Player lives a luxurious life, a fact that is incompatible with his/her professional or business activity or financial situation or his/her socio-economic profile.

g. There is information that the Player is involved either in offshore operations or in operations with a negligible physical presence.

h. The Player executes transactions that are not consistent with his/her usual Gaming Activity and patterns.

i. The Player performs successive small amount transactions whose overall amount is really high.

j. The Player seems to be unusual nervous throughout the Business Relationship.

k. Both the number and frequency of said transactions relate to amounts that are below the thresholds set out in the Regulation.

l. The fact that the Player places complex or unusual bets with no apparent economic purpose or places wagers for all possible outcomes of the same betting event.

m. There is an attempt to cash a ticket which has been already reported lost.

n. The fact that the Player presents a large number of payment orders made in his/her own name in order for a winnings certificate to be issued and/or submit a request to get said certificate for winnings obtained from tickets won which are geographically dispersed in an unusual manner.

o. The fact that the Player during payment does not confirm that the payment account declared really belongs to the him/her.

p. The fact that the Player has requested a Transfer of Funds to a third-party payment account.

q. The fact that the Player requests winnings to be paid on a third-party payment account.

r. The fact that deposits are made to an Electronic Payment Account through Means of Payment which belong to a third party.

s. The fact that the Player activates Electronic Payment Accounts which have been inactive for a long time period.

t. The fact that deposits on an Electronic Player Account have been made but the Player removes these funds without having participated in Games or the Player participates in Games paying unjustified small amounts compared to those already deposited.

u. The fact that the number of the Electronic Player Accounts is really unusual and the Player opens and closes his/her Electronic Accounts in an unusual frequency.

v. The fact that the Player requests for his/her winnings payment to be made on a payment account held in non-cooperative jurisdictions.

B. All the aforementioned facts are evidence, as the case may be, that Suspicious or Unusual Transactions were executed by the Staff of the Obliged Entity and the Physical Network, as well as by the natural persons who are obliged to hold a Suitability Licence pursuant to Articles 5 and 7 of Ministerial Decision No. 79305 ΕΞ 2020 entitled “Gaming Regulation on the Suitability of Persons” (Government Gazette 3262/B). Moreover, there are some other facts listed below to be also taken into account:

a. There is an increased participation of the persons or their close families in the Games of Chance.
b. Tickets are redeemed in unusual large amounts as compared with the persons’ usual turnover.
c. The persons failed to comply with the provisions of the AML Law and of the Regulation.
d. An unusual great number of payment orders has been made in the name of said persons for tickets whose amounts are below the prescribed threshold.
e. There is an unjustified increase in the volume of transactions.

This decision shall be published in the Government Gazette.

Chairman

DIMITRIOS TZANATOS