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GOVERNMENT GAZETTE

HELLENIC REPUBLIC

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SECOND ISSUE

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DECISIONS

No. 79314 ΕΕ 2020

Enactment of Gaming Regulations on the Running of Video Lottery Terminal (VLT) Games.

THE MINISTER OF FINANCE

Having regard to:

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 of Finance, Culture and Tourism and Labour and Social Security (Government Gazette 180/A), in particular Article 29(3) and Articles 189-203 of Law 4635/2019 on Investing in Greece and other provisions (Government Gazette 167/A);

b) 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 on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJL 119);

c) Law 4624/2019 on the Hellenic Data Protection Authority (HDPa), measures for implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of personal data, and incorporation into Greek law of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016, and other provisions (Government Gazette 137/A);

d) Paragraphs 1, 2 and 3 of Article 86 of Law 4623/2019 on regulations regarding the Ministry of the Interior, provisions for digital governance, pension arrangements and other urgent matters (Government Gazette 134/A);

e) Articles 13, 18, 19 and 41 of Law 4622/2019 on the Executive State: organisation, operation and transparency of the Government, governmental agencies and central public administration (Government Gazette 133/A);

f) Law 3861/2010 on the enhancement of transparency with the mandatory posting of laws and acts of governmental, administrative and self-government bodies on Diavgeia Transparency Initiative (online access to laws) and other provisions (Government Gazette 112/A) and Law 3469/2006 on the National Press Office, Government Gazette and other provisions (Government Gazette 131/A);

g) Articles 16 to 23 of Law 3229/2004 on the supervision of private insurance, supervision and control of games of chance, implementation of the International Accounting Standards and other provisions (Government Gazette 38/A) and, in supplement, the provisions of Law 3051/2002 on constitutionally-established independent authorities, amendment and supplementation of the public sector recruitment system and related regulations (Government Gazette 220/A);

h) Article 27 of Law 2843/2000 on the modernization of stock exchange transactions, introduction of companies investing in seagoing shipping in the Athens Stock Exchange and other provisions (Government Gazette 219/A);

i) Presidential Decree No. 81/2018 on the incorporation into Greek law of Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 (OJ L 241, 17.9.2015, p. 1) laying down a procedure for the provision of information in the field of technical regulations and of rules on Information Society services (codification) and other provisions (Government Gazette 151/A);

j) Article 34 of Presidential Decree No. 142/2017 on the organizational structure of the Ministry of Finance (Government Gazette 181/A);

k) Presidential Decree No. 60/2010 amending Presidential Decree No. 363/1998 with respect to the Certificate of Greek Language, type, conditions of acquisition, procedure and content of examinations, conditions for participation and regulation of relevant details (Government Gazette 242/A) 98/A);

l) Presidential Decree No. 106/2007 on the freedom of movement and residence in the Greek territory of citizens of the European Union and their family members (Government Gazette 135/B);

m) Article 90 of Presidential Decree No. 63/2005 on the codification of the legislation on Government and governmental agencies (Government Gazette 98/A) read in conjunction with Article 119(22) of Law 4622/2019 (Government Gazette 133/A);

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

o) Decision No. 2/63389/0004/21.7.2016 issued by the Minister of Finance on the appointment of the Chairman and two members, and on the renewal of the term of office of the members of the Hellenic Gaming Commission (ΥΟΔΔ397) read in conjunction with similar Decisions Nos. 2/3935/0004/24.7.2018 (ΥΟΔΔ428), οικ. 9433 ΕΞ 2019/12.2.2019 (ΥΟΔΔ64) and 3557 ΕΧ2020 (ΥΟΔΔ 20);

p) Decision No. 010010/4.11.2011 issued by the Minister of Finance (Government Gazette 2503/B), as amended by similar Decision under Ref. No. ΔΕΕΟΘ/Γ/0000647/ΕΞ2018/18 (Government Gazette 2503/B) with which the Société Anonyme under the name Organization of Football Prognostics (OPAP S.A.) was granted a license to operate 25,000 Gaming Machines of the Video Lottery Terminal (VLT) gaming machines in pursuant to the provisions of Articles 39 to

44 of Law 4002/2011 (Government Gazette 180/A);

q) HGC Decision No. 225/2/25.10.2016 on the Hellenic Gaming Commission-Amendment, completion and codification of HGC Decision No. 158/4/5.6.2015 (Government Gazette 328/B) as in force, (Government Gazette 3528/B), which entered into force pursuant to Article 86(2) of Law 4623/2019 (Government Gazette 134/A);

r) Commission Recommendation No. 2014/478/EU of 14 July 2014 on the principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online (OJ L214);

2. HGC Decision No. 496/1/25.06.2020 suggesting to the Minister of Finance that a Gaming Regulation for the running of VLT games, pursuant to Article 29(3) of Law 4002/2011 (Government Gazette 180/A).

3. The fact that the provisions suggested by HGC Decision No. 496/1/25.06.2020 do not need to be notified to the EU under Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 (OJ L241), since they do not extend existing restrictions and/or restrictions which were already notified nor do they introduce new restrictions, obstacles or prohibitions in relation to the access, provision, installation and use of gambling services and regarding the specifications for products and services related to such provision and use.

4. The Contract signed on 4.11.2011 between the Greek State and OPAP S.A., as amended by the Amendment Act dated 19.1.2018 specifying the conditions under which OPAP S.A. was granted the license under item (n) thereof to operate 25,000 Video Lottery Terminal (VLT) gaming machines, pursuant to Articles 39 to 44 of Law 4002/2011 (Government Gazette 180/A

5. The need to regulate issues relating to the running of Video Lottery Terminal (VLT) games.

6. The fact that this Decision does not place a financial burden on the State budget or the HGC budget, we hereby decide as follows:

GAMING REGULATIONS ON THE RUNNING OF VIDEO LOTTERY TERMINAL (VLT) GAMES

Article 1

DEFINITIONS

For the purpose of this Decision, words and phrases herewith shall have the following meaning:

Suitability License (SL) shall mean the decision approving a person's suitability in accordance with the relevant provisions of the Gaming (suitability of persons) Regulations.

Exclusively Gaming Venue shall mean the Venue where it is permitted to conduct Gambling only through Gaming Machines, in accordance with the current planning legislation regarding land use, as specified on a case-by-case basis.

Payout shall mean the ratio of Total Units won to Total Credits played in the same Game expressed as a percentage (%).

Individual Player Card (IPC) shall mean the card referred to in Article 33 (4) of Law 4002/2011 (Government Gazette 180/A).

Excluded Player shall mean the person referred to in item (p) of Article 25 of Law 4002/2011 (Government Gazette 180/A).

Player Database shall mean the database where all the necessary data of the Players are stored for the issuance of the Individual Player Card, the data relating to the Gaming Activity and all related transactions.

Random Number Generator (RNG) shall mean a number generator which comprises software and/or hardware and is installed either in the Gaming System Server or in each Gaming Machine and generates random number combinations in order to create an outcome for each Game (Cycle).

Notification is an HGC written notification about the Operator's intention to

change certain data regarding the running of Games via Gaming Machines. The change notified may take place after five (5) days as of the date of notification and provided that the HGC, within the aforementioned time frame, does not ask for any additional information or express a contrary opinion.

Communication Network shall mean the set of necessary hardware, software and network interfaces for real-time communication of the gaming machines with the CIS.

Running shall mean running 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 "Organising" they shall also mean the concept of "Running" and vice versa.

Organisation shall mean organising a Game referred to in Article 25(t) of Law 4002/2011 (Government Gazette 180/A). Where the provisions of this Decision refer to the concept of "Organising" they shall also mean the concept of "Running" and vice versa.

Importer or Supplier shall mean the person who supplies, sells, resells, leases, promotes, offers and in any way provides Games and/or Gaming Machines and for this purpose was granted a Suitability License by the HGC.

Commercial Communication shall mean any form of displaying and promoting the organization and running of Games or the Operator's image. The concept of Commercial Communication includes Sponsorship, Corporate Social Responsibility and Loyalty Programs.

Intermediate Control System shall mean the IT system which ensures the integrity, authenticity and continuous availability of data collected by the Data Capture System, the Data Sealing System and the Safe.

Gaming System Server shall mean the set of necessary hardware and software used, maintained and controlled by the Operator which is required to achieve central organization, operation, running, monitoring,

recording, control and management of Games conducted through Gaming Machines.

Online Player Account shall mean the account referred to in Article 25(o) of the Law.

Daily Loss shall mean the amount of money determined by the Player to be the maximum amount that the Player can lose within a calendar day and is equal to the difference that arises if the Credits won, within the same calendar day, are deducted from the cash-in.

Regulations shall mean this Decision which regulates the conduct and control of Gambling conducted through VLT-type Gaming Machines.

Suitability shall mean the finding made by the HGC concerning the qualifications and conditions for the issuing of a SL in accordance with the provisions of the Gaming (Suitability of Persons) Regulations.

Manufacturer shall mean the person who manufactures (designs, plans, assembles, produces and programs) and in any manner makes available any Technical Means and Materials, and who has obtained a Suitability Licence from the HGC for this purpose.

Venue shall mean the place where Games are conducted through Video Lottery Terminal (VLT-type) Gaming Machine for which it has obtained a relevant HGC Certification.

Central Information System (CIS) shall mean all hardware and software needed for the Operator to organise, operate, conduct, monitor, record, check and centrally manage the Games conducted through Gaming Machines.

Game Cycle shall mean a full sequence of events in a Game which commences with the wager and lasts until the credits for that sequence are carried forward or lost.

Accounting System shall mean that part of the CIS which collects and processes accounting data derived from Gaming System Servers, Gaming Machines, as well as other systems related exclusively to such

data, for the purpose of their being detected and managed.

Register shall mean the set of data kept by the HGC on Games, Gaming Machines, Venues, as well as Manufacturers, Importers-Suppliers and Technicians.

Credit shall mean the unit of account representing the minimum amount of money that the Player uses for participating in each Game.

Law shall mean Law 4002/2011 (Government Gazette 180/A).

Certification Body shall mean the certification body which operates a specialised test lab and has been recognised by the HGC in accordance with the Gaming (Suitability of Persons) Regulations, or a certification body accredited in accordance with the applicable European and/or international standards, by the National Accreditation System S.A. (NAS) or by accreditation bodies in other countries, with which the NAS S.A. has signed a mutual recognition agreement.

Session Loss shall mean the amount of money determined by the Player as the maximum amount that may be lost from the commencing to the end of a Play Session and is defined as the difference arising if the credits won within the same Playing Session are deducted from the cash-in.

Player shall mean the natural person who holds an Individual Player Card.

Gaming Activity shall mean all transactions and other information held in the Operator's IT Systems about each individual Player which is linked to the Individual Player Card. The details on the Gaming Activity are stored in the Player Database, are available to the Player upon request and are supervised by the Responsible Gaming Control System.

Play Session shall mean the time period from the moment the Player inserts his/her Individual Player Card to a Gaming machine to the moment the Player removes the card from it.

Game shall mean the game conducted through a VLT-type Gaming Machine which has been certified by the HGC.

Gaming Machine shall mean the electronic Video Lottery Terminal (VLT-type) Gaming Machine which is used for conducting games and has been certified by the HGC.

Payment Service Provider shall mean a credit institution or payment institution or electronic money institution that is lawfully established and operates in Greece or in another Member State of the European Union or of the European Economic Area in accordance with the relevant provisions.

Certification shall mean the approval granted by the HGC to install and start using Technical Means and Materials after the certification body has ensured compliance with the Technical Specifications or has certified that all technical and functional characteristics of the Technical Means and Materials as well as of the venues where games are conducted comply with such specifications.

Supervision and Control Information System shall mean the information system specified in Article 30 of the Law.

Prepaid card shall mean the card which contains the amount of money indicated on it and/or is credited with units of money.

Concession Agreement shall mean the signed contract dated 4.11.2011 between the Greek State and the Operator, as amended by the Amendment Act dated 19.1.2018 and in force which specified the conditions under which the Operator was granted the license to operate 25,000 Video Lottery Terminal (VLT) gaming machines pursuant to the provisions of Articles 39 to 44 of Law 4002/2011 (Government Gazette 180/A).

Accession Agreement shall mean a contract signed between the Player and the Operator.

Credits won shall mean the total number of credits that players have won during a particular game or on a gaming machine.

Credits played shall mean the total number of credits that players have played during a particular game or on a gaming machine.

Individual Player Card Management System shall mean that part of the CIS which issues and manages the Individual Player Card and monitors its operation.

Gaming Management System shall mean that part of the Gaming System Server which manages and monitors the operation of the Gaming and Jackpot software. It includes the game storage system and manages the functions related to the distribution of the games in each gaming machine.

Player Management System shall mean that part of the CIS which manages the Player Database.

Communication Control System shall mean that part of the CIS which manages the communication functions between the Gaming Machines and the Gaming System Servers.

Responsible Gambling Control System shall mean that part of the CIS which controls, records and generally supervises the Gaming Sessions to ensure the implementation of limits on Gaming Activity pursuant to Article 39.

Control System shall mean that a part of the CIS which proceeds to a real-time control and stores the system functions and the data shared among the Gaming System Servers and the CIS.

Data Backup and Recovery System shall mean that part of the Gaming System Server and of the CIS which ensures the system's recovery in the event of a disaster, as well as data storage and recovery, restoration of functioning and creation of copies of all data included in the Gaming System Server and the CIS.

Technical Specifications (TS) shall mean the specifications set out for the software, hardware, networks, systems and other equipment referred to in the Gaming Regulation laying down Technical

Specifications for Games conducted through VLT-type Gaming Machines.

Technical Means and Materials for playing Games shall mean the certified (where necessary) means/materials/electronic/mechanical/electromechanical device and electronic program (all manner of software or computer system) used directly or indirectly to organise and run Games which is related to and/or affects and/or determines and/or monitors and/or records the outcome of the Game or the playing of the Games in general.

Technician shall mean the person who provides game and/or gaming machine repair and maintenance services and has been granted an HGC Suitability License for this purpose.

Responsible Gambling shall mean all provisions that aim to ensure that all activities in the field of games of chance are performed pursuant to the provisions in force, in a socially responsible manner, and in order to minimise consequences for the Players due to their participation in the games of chance.

Operation Manager shall mean the natural person, who along with the Operator are jointly and severally responsible to supervise compliance with the provisions of Law 4002/2011 (Government Gazette 180/A) and this Regulation, during the running of Games in Venues.

Subcontractor shall mean the person with whom the Operator has entered into a contract for the supply, installation, upgrade, maintenance or support of information systems and communication networks which are used or otherwise related to the running and operation of Gaming Machines.

Operator shall mean the legal entity which holds the Gaming License for the games conducted through gaming machines. OPAP S.A. shall be the Operator, pursuant to the provisions of Article 39 of Law 4002/2011 (Government Gazette 180/A) and Decision No. 010010/4.11.2011 issued by

the Minister of Finance (Government Gazette 2503/B).

Jackpot shall mean a fixed or progressively increasing value awarded to Players which is accumulated by depositing credits from the Operator and/or by withholding Credits from one and/or more Games in one and/or more Gaming Machines in one and/or more Venues, which participate in the Jackpot, in accordance with the terms approved on a case-by-case basis by the HGC and the Minister of Finance.

Game Jackpot shall mean the Jackpot awarded through the Gaming Management System to the player who is the first to hit the top prize included in the pay table of said game which participates in the Jackpot.

System / Mystery Activated Jackpot shall mean the Jackpot attributed by the Gaming Management System to the Player, which will make the progressive Jackpot meter reach or exceed the “mystery value” between Jackpots’ minimum and maximum limit created through a certified RNG.

Article 2

GENERAL PRINCIPLES

2.1. This Regulation shall apply to Games conducted exclusively through Video Lottery Terminal (VLT) Gaming Machines (VLT-type machines).

2.2. Pursuant to the provisions of Article 34 of Law 4002/2011 (Government Gazette 180/A), the Player, the HGC as well as the specially recruited and trained for this purpose staff employed by the Operator, which shall be notified to the HGC, reserve the right to access Gaming Activity.

2.3. The Operator is not allowed in any way to link and/or associate Gaming Activity with the Player personal details, apart from the following cases:

2.3.1. In order to comply with the applicable legal and regulatory framework, such as, in particular, where persons under the age of 21 are not allowed to access the Games, checking if the Players correspond with actual natural persons,

providing data to the Players upon relevant request, cross-checking the tax obligations arising from profits and issuing a certificate of winnings are necessary. The Operator shall notify the HGC of all necessary measures to be taken in order to comply with this provision.

2.3.2. In the case of Commercial Communication, including implementation of any loyalty programs.

2.4. The Operator shall ensure that Games are organized and conducted in a reliable and safe manner, in accordance with the mandatory rules, the public policy principles, the Technical Specifications and the applicable provisions, as well as that, during the running of the games, persons under the age of 21 shall be excluded, vulnerable social groups shall be protected and that public health and safety, and the transparency of transactions shall not be endangered.

2.5. The Operator who operates a Gaming Venue, along with its staff and the members of its management bodies, are not allowed to participate in the Games they conduct nor should they be involved in their running by any means.

2.6. Participation in the Games through intermediaries is not allowed.

2.7. Movement and management of files and documents between the HGC and the Operator are usually carried out electronically. To this end, the Operator is obliged to use a digital signature for the issuance, distribution and management of such documents.

2.8. The HGC may issue a special license to test proper operation of the new games once they are placed on the market pursuant to Article 44(3) of the relevant Law.

2.9. In case the Venue's operation has been prohibited, the Suitability Licenses granted to Manufacturers, Importers-Suppliers and Technicians have been revoked or the Technical Means and Materials Certification has been withdrawn, as well as in case the venue no longer operates, for any reason whatsoever, any fees

paid shall not be refundable, in accordance with the applicable provisions and the Regulation.

2.10. The HGC, at its discretion, is entitled to verify, in whole or by sampling, the accuracy of the data submitted for the purpose of implementing the Regulation.

2.11. The Venue Certification relates to the fact that this place is suitable for the running of games, in accordance with the requirements set out by the Regulation.

2.12. Technical Means and Materials used by the Operator for the running, supervision and control of the Games shall be placed in an area specified by the relevant Certification, if required. Based on said Certification, the place of installation may be a Venue, an apartment in a building or a building. Any movement from this area, for whatever reason, shall take place once the HGC is properly notified on the next working day and in accordance with the specified procedure. Movement within the specified by the relevant Certification areas and venues shall be allowed without prior information of the HGC.

2.13. The Operator is obliged to have a full technical infrastructure for the running of the Games and this shall be under the Operator's responsibility and at their own expense, in accordance with the relevant Technical Specifications and the Regulation.

2.14. The HGC, for the purpose of implementing the principle of mutual recognition, may grant the certifications provided for in the Regulation on the Organization and Running of Games, which are lawfully produced and/or sold in other countries, provided that the protection level they offer is equivalent to the one specified in the Technical Specifications and the Regulation. The Certifying Organizations are assigned the task of confirming the existence of an equivalent level of protection, at the expense of the applicants for such Certification. An HGC decision shall define the jurisdictions that fall under the principle of mutual recognition, as well as the specific

technical details and the supporting documents based on which the equivalent level of protection shall be documented.

2.15. The HGC shall keep a Register of Games, Gaming Machines, Venues, as well as of Manufacturers, Importers-Suppliers and Technicians. Posting on the Registry constitutes sufficient disclosure and proof of the existence of the relevant Certification or Suitability.

2.16. The Operator shall be responsible for determining the opening hours of type B' and type F' Gaming Machine Venues, which shall be from 10.00 to 02.00 the next day or, if it is Friday or Saturday or on the eve of a public holiday, from 10.00 to 04.00 the next day. For Type E' Gaming Venues, they shall operate only on board. Type B' Gaming Venues are allowed to operate in case of local or public holidays or due to seasonality on a 24-hour basis for a maximum period of fifteen (15) days annually, upon relevant notification of the Operator to the HGC.

2.17. Certifications granted by the HGC in accordance with the provisions of the Regulation shall be valid for an indefinite period, provided that all legal conditions and the conditions for maintaining the registration are complied with, as the case may be.

CHAPTER A':

GAME, EQUIPMENT AND VENUE SPECIFICATIONS

Article 3

GAME CERTIFICATION REQUIREMENTS

3.1. In order for a Game to be certified by the HGC, the following cumulative conditions must be met:

3.1.1. The Manufacturer and/or its Importer-Supplier shall have obtained the required Suitability License granted by the HGC in accordance with the provisions of Articles 11 and 12 of the Regulation.

3.1.2. The Game shall be a software application which complies with the Technical Specifications and the Regulation.

3.1.3. The outcome of the Game shall not be affected, controlled or related to anything other than the numerical values generated by a certified RNG in relation to the applicable payable and Game rules.

3.1.4. The probability of each event occurring (e.g. dealing a deck of cards) must be the same as the probability of that event occurring under real life situations.

3.1.5. The Game software is designed in such a way that on average, it will deliver to a statistically significant number of participants at least the theoretically calculated payout percentage as defined in the application for its certification by the HGC. The payout percentage cannot be less than 80% for each Game. This parameter shall be checked once the number of Game Cycles reaches five million (5,000.000), and thereafter every five million (5,000.000) Game Cycles.

3.1.6. The minimum and maximum amounts to participate in the Games as applicable shall be adjusted by HGC decision. The amounts that will enable the Player to participate in the Game shall be displayed on the screen of each Gaming Machine.

3.1.7. A new Game Cycle may not commence until three (3) seconds have elapsed since the commencement of the previous Cycle.

3.1.8. The maximum amount won in each Game may not exceed seventy thousand (€70,000) euro per Game Cycle including the value of all additional Game prizes that may be provided excluding any Jackpot award in accordance with the provisions of the Regulation.

3.1.9. Symbols or any other illustrations used in the Game shall not offend the accepted principles of morality, national and religious symbols.

3.1.10. Games shall be set up so that before the commencement of the first Game

Cycle the HGC Certification number will be displayed on the screen for so long and with such frequency that the Player can easily read it. The Game Certification number may be displayed on the main Game selection screen or on any other Gaming Machine screen.

3.2. The Game rules, the relevant instructions for the Player's participation and the pay table shall be made available to the Player through the screen and/or through the help screen according to the following guidelines:

3.2.1. The Game rules, the Gaming Machine instructions on which the Game is being conducted, as well as the relevant information shall be written in Greek. The aforementioned rules and instructions shall be clear and easily understood by the Player, shall not mislead him/her and shall enable him/her to check the accuracy of the attributed winnings.

3.2.2. The pay table for each Game shall be either shown as a function of the participation stake or explain in a clear and easily understood way how to calculate the payout in relation to each participation stake. All amounts shall be displayed in euro and cents. The maximum amount of prize money shall be clearly indicated.

3.2.3. The help text shall explicitly state how to calculate the winnings in case they result from multiplying them by the total participation stake.

3.2.4. The date format shall comply with the format used in Greece (day, month, year).

Article 4

GAMING MACHINE CERTIFICATION REQUIREMENTS

4.1. In order for a Gaming Machine to be granted Certification by the HGC, the following cumulative conditions must be met:

4.1.1. The Manufacturer and/or their Importer-Supplier have obtained the required EC Type-Approval from the HGC in

accordance with the provisions of Articles 11 and 12 of the Regulation.

4.1.2. The Gaming Machine is manufactured and operates in accordance with the Technical Specifications and the Regulation.

4.1.3. The Gaming Machine shall bear the CE marking or its equivalent in case it has been manufactured or placed on the market in a country of the European Free Trade Association (EFTA), which is a contracting party to the Agreement on the European Economic Area (EEA), or in Turkey for products for which a mutual recognition clause applies under the conditions of the interpretative communication (2003/C 265/02) of the European Commission.

4.1.4. The Gaming Machine shall be provided with the necessary equipment to enable it to interface and communicate in real time with the Gaming System Server using a reliable and secure communication protocol.

4.1.5. The Gaming Machine shall not place the Player at any physical risk.

4.1.6. The Gaming Machine shall be fitted with a robust and watertight metal outer casing of high strength and safety. Inside there shall be safe compartments in which the most critical components of the Gaming Machine are placed, such as the electronic logic part, etc. The interior of these safe compartments may only be accessed by specially authorised personnel.

4.1.7. The Gaming Machine shall bear a label affixed by the Manufacturer in a prominent place on the outer casing indicating at least the Manufacturer, type, model and unique serial number of the gaming machine.

4.1.8. A game shall not be conducted through a Gaming Machine without inserting the Individual Player Card into it.

4.1.9. The Gaming Machine shall be equipped with one or more of the following credit-based incentive mechanisms:

a. A high-security coin and/or bill acceptor with the ability to detect and reject

unacceptable and/or counterfeit coins and bills. The coin and/or banknote boxes shall be of high strength and security.

b. A Prepaid Card. Reading the data of the Prepaid Card and the Individual Player Card is carried out with a simultaneous, independent verification of the data it contains.

c. A pre-printed voucher bearing a barcode and containing Credits, controlled by the Gaming System Server.

d. Credits added to the Online Player Account.

4.1.10. The Gaming Machine shall be equipped with a built-in printer for printing receipts in Greek, and shall offer the option of printing barcodes, unless the Player is provided with an alternative method of collecting winnings such as a cashless accounting system which does not require a printer.

4.1.11. The Gaming Machine shall have the ability to implement and manage multiple interconnected Jackpot modes of all or certain gaming machines and games in one or more of the Venues where such operations are conducted.

4.1.12. Aside from the connection port to the Communications Network, the gaming machine shall not be equipped with any manual or electronic wired or wireless device or any internal or external component or device that could interfere with the normal operation of the games, their software, the odds of outcomes, the levels and percentages of winnings, the electronic RNG, etc. or provoke any alteration, tampering or deletion of the data stored in the gaming machine.

4.1.13. The Gaming Machine shall be equipped with a special safe door, any opening of which shall automatically cause an immediate interruption of its normal operation and a warning signal to the staff of the venue. At the same time, it shall feature electronic logging and ensure that only a test operation is possible during the shutdown.

4.1.14. The Gaming Machine shall be provided with appropriate equipment that fully ensures:

a. The smooth, reliable, trustworthy, safe and uninterrupted conduct of the Games;

b. The randomness and unpredictability of winnings;

c. Compliance with the payout percentages defined by the applicable provisions and the Regulation and/or the relevant approvals of the HGC;

d. The high-level availability of the gaming machine and the games;

e. The integrity of the software, the stored data and all functionalities of the gaming machine and the games;

f. The central monitoring, audit and management by the Gaming System Server.

4.1.15. The Gaming Machine shall be provided with the appropriate equipment for the secure measurement, logging and storage of various data relating to the forms of gaming conducted (e.g., financial data, security data, etc.) as well as the transmission of such data directly or indirectly to the Central Information System, the Gaming System Server and the Supervision and Control Information System.

4.1.16. The Gaming Machine shall be capable of identifying and detecting faults, problems and malfunctions.

Article 5

VENUE CERTIFICATION

REQUIREMENTS

5.1. The Venue Certification for conducting games shall be granted by the HGC upon application by the Operator.

5.2. To be granted the certification of a Venue by the HGC, the venue should meet the requirements set by the applicable provisions and the specifications set out in this Article.

5.3. The installation, operation and conduct of games using gaming machines are permitted only in exclusively gaming facilities. OPAP S.A. stores are considered

exclusively gaming facilities for the installation of games if they meet the terms and conditions set out in the Regulation.

5.4. To install gaming machines in a Venue, a minimum of three (3) square meters of net floor area per gaming machine is required.

5.5. Gaming Machines shall be installed and operated in each Venue up to the number provided for by the applicable provisions of the law.

5.6. The Venues should comply with the terms of the applicable legislation on urban planning, safety, fire safety, market policy and health regulations.

5.7. Should the operation of the Venue be permanently prohibited by a competent authority, the granted Venue Certification is also revoked. Withdrawal of the Certification shall be automatic without any other procedure or wording as of the date of prohibition of the operation of the Venue.

5.8. The events referred to in paragraph 5.7 as well as any temporary prohibition of the operation of the Venue shall be immediately transmitted by the Operator to the HGC.

5.9. Venues of any type should not be connected in any way internally to each other or to other premises.

5.10. The entrance/main exit of the Venues shall be one and shall be located more than two hundred (200) meters, measured on foot, from the main entrance of elementary schools, secondary schools and boarding schools, whether located in the building or in the yard.

5.11. No Venue shall be permitted to operate where there is a main entrance to a kindergarten both along the entire length of the side of the block on which the main entrance is located and on the corresponding part of the opposite side of the block facing the street. In case the kindergarten is built at the junction of two streets, the operation of a Venue is prohibited within the invisible circle drawn with the centre at the junction of these streets and the radius of the length of

the shorter of the two corresponding sides of the building block. The above restrictions shall be taken into account cumulatively.

5.12. The restrictions specified in paragraph 5.10 and 5.11 shall not apply to type F' Venues for which the distance restrictions provided for in the OPAP Agent Regulation apply, as well as to type E' Venues.

5.13. Type B' Venues are at least two hundred (200) meters apart, measured as the closest walking distance between their main entrances and more than five (5) kilometres, measured in a straight line, from existing casinos. As regards type F' Venues and the minimum distances between them, the specific provisions of the OPAP Agent Regulation shall apply.

5.14. Without prejudice to compliance with the provisions of paragraph 5.13, the Operator shall geographically allocate and install type B' and F' betting shops in accordance with the specific criteria for the geographic allocation of betting shops and the relevant procedure which is specified in the OPAP S.A. Agent Regulation.

5.15. Gaming Machines should be installed so as not to be visible from the exterior of Type B' and Type F' Venues.

5.16. Within the Venues, the distribution, sale and/or consumption of alcoholic beverages containing more than 15% by volume of alcohol is prohibited.

5.17. The installation of automated teller machines (ATMs) within the Venues or on their fronts is prohibited.

5.18. The Type B' Venue Certification is granted provided that the place of installation of the Gaming Machines and operation of the Venue to be certified:

5.18.1. Is a legal main use area and is not internally connected to any other premises.

5.18.2. Has the minimum area of the gaming machines net installation area defined as three (3) square meters per Gaming Machine. Net area shall mean the net area of the Venue excluding the areas described in paragraph 5.18.3 below.

5.18.3. In addition to the gaming machine installation area, the Venue shall have at least:

- a. One (1) men's restroom and one (1) women's restroom with an anteroom. If an accessible restroom exists or is to be installed on the premises, it is not required to have an anteroom;
- b. A reception area, a cash desk and a waiting area; and
- c. A storage room.

5.18.4. Type B' Certification is not granted to venues located at a distance equal to or less than five (5) kilometres from existing casinos, measured in a straight line.

5.19. Type F' Venue Certification is granted if:

5.19.1. The gaming machine installation area is a legal main use area and is not internally connected to another venue.

5.19.2. There is a clearly defined and distinct area for the installation and operation of the Gaming Machines, which is accessible from the entrance of the Venue. In Type F' Venues where up to six (6) Gaming Machines may be placed either in an enclosed area within the Venue or in a completely separate, spatially distinct room of the Venue (e.g., on a floor, loft, etc.) or placed in such a way that the Operator limits by any appropriate means and manner, depending on the size, shape and layout of the Venue, the visibility of the Gaming Machines' screen from the interior of the Venue.

In Type F' Venues where seven (7) to fifteen (15) Gaming Machines may be placed, these are placed in an enclosed area within the Venue or in a completely separate, spatially distinct room of the Venue (e.g., on a floor, loft, etc.).

Regardless of the type of the Venue and in any case where the Gaming Machines are placed in an enclosed area within the Venue or in a completely separate, spatially distinct room of the Venue (e.g., on a floor, loft, etc.), a closed-circuit television (CCTV) shall be installed. CCTV recording data shall

be retained for a period of thirty (30) days. In the event of a dispute or complaint under Article 41, the storing and availability of the data shall be enforced until the dispute is finally resolved. Stored data shall be made available to the HGC, upon request, within two (2) days at the latest.

The above areas shall be all marked with special signs prohibiting the entry and stay of persons aged under 21 and with warning signs about the potential dangers of participation in the Games.

5.19.3. The minimum area of the installation area per Gaming Machine in the Venue to be certified shall be three (3) square meters.

5.19.4. The area of the gaming machine installation area is not included in the minimum area required for the legal exercise of the activity of an OPAP S.A. betting shop regarding all other games.

5.20. Seagoing vessels engaged in international voyages are permitted to establish an exclusively gaming facility equipped with Gaming Machines. This area shall be provided with a Type E' Certification. The Type E' Venue Certification shall be granted if:

5.20.1. The operation of the gaming premises equipped with Gaming Machines is provided for in the Vessel Certificate of Registry.

5.20.2. The area where the Gaming Machines are installed is designated for the exclusive use of the premises and is separated from the other parts of the vessel.

5.20.3. The minimum net installation area per game machine is set at three (3) square meters. Net area shall mean the net area of the premises designated for this purpose, which shall be suitable for this purpose, excluding any other use thereof.

5.20.4. Besides the gaming machine installation area, the Venue shall have at least ten (10) square meters for a reception area, a cash desk and a waiting area. The Venue area shall not be counted as a

passenger lounge within the meaning of the Accommodation Regulation.

Article 6

LAWFUL OPERATION LABEL FOR GAMING MACHINES

6.1. Each Gaming Machine shall bear a legal operation label which shall include, at least, the HGC logo, the Gaming Machine Certification Code and the unique serial number of the Manufacturer. The specific details of the display of the label and any additional technical specifications shall be laid down by a relevant HGC decision.

6.2. The above label shall be produced and printed at the responsibility and expense of the Operator. The Gaming Machine is considered to operate in a lawful manner only if it bears a legal operating label which has not been tampered with.

Article 7

VENUE LABELLING

7.1. In each Venue, a Legal Operation Certification label shall be displayed in a prominent place at the entrance, indicating at least the code and type of the Venue Certification including the specific details of the label as well as any additional technical specifications, as defined by the HGC. The aforementioned label shall be produced and printed at the responsibility and expense of the Operator.

7.2. Signs prohibiting the entry of persons who are under the age of twenty-one (21) and Excluded Persons, as well as warning signs about the potential dangers of/resulting from participation in the Games, shall be posted both inside and outside the Venue.

Chapter B':

STAFF, GAME, EQUIPMENT AND VENUE CERTIFICATIONS

Article 8

OPERATOR'S OBLIGATIONS

8.1. The Operator shall strictly comply with the legislative and regulatory provisions

on the organisation and running of Games using Gaming Machines, the terms of the Concession Agreement, the provisions of the Regulations and the Technical Specifications.

8.2. The Operator should, in particular:

8.2.1. Take all necessary measures to prevent access to the Venue by persons who are under the age of twenty-one (21).

8.2.2. Take all necessary measures to prevent access to the Venue by the Excluded Persons.

8.2.3. Discourage the unreasonable use of Games and ensure the application of the principles of Responsible Gambling.

8.2.4. Operate exclusively certified Gaming Machines through which only certified Games shall be conducted, which shall be installed and operated exclusively in certified Venues.

8.2.5. Take all reasonable measures to exclude betting among Players and/or third parties based on the prediction of the outcome of the Games.

8.2.6. Ensure that the certified Gaming Machines and Games have not been modified, altered, reprogrammed or otherwise modified, in any way, in any of their elements or characteristics in relation to those taken into account in order for the Gaming Machine or Game to be certified.

8.2.7. Ensure that nobody, other than the Technicians, has access to the setting points of the Gaming Machines or the Gaming software.

8.2.8. Take all necessary measures to ensure that staff involved in the conduct of Games is informed about the applicable provisions, the Regulation, as well as the Operator's measures and procedures which specify the aforementioned points and ensure that staff shall take part in specialised training programs focused on these issues.

8.2.9. Ensure that the HGC authorised bodies are provided with full and unhindered access, electronically and/or with physical presence, to the Central Information System, the Gaming System Servers, the

Communication Networks, as well as to the Gaming Machines, Games and Venues.

8.3. The Operator should train the Operation Managers and the employees of the Venues so that they are able to:

8.3.1. Inform the Players about the responsible conduct of the Games and to provide them with information on how to help them with Game addiction.

8.3.2. Prevent participation in the Games and/or access to the Venue to those who exhibit signs of being under the influence of alcohol or other addictive substances or displaying symptoms of drowsiness and in general when it is obvious that their general condition cannot guarantee the conduct of Responsible Gambling.

8.3.3. Handle unacceptable Player behaviour in a discreet and sensitive manner.

8.3.4. Keep an events file in the Venue in which events that require on-site response shall be recorded, as well as the type of handling applied and the results thereof.

8.4. The Operator should comply with the applicable legislation for the protection of the personal data of the Players which may not be disclosed in any way. In this respect, it shall duly inform and bind all those who have access to such data and shall take appropriate preventive measures to prevent the identification of the Players by technical or other means that may reasonably be used by third parties.

8.5. The Operator shall impose as a contractual condition the observance of the obligations arising from the applicable legislation, the relevant regulatory provisions, the terms of the Concession Agreement and the relevant Regulation by the OPAP S.A. Agents, the Subcontractors and the Staff involved.

8.6. The Operator shall immediately inform the HGC in any case of violation of the legislation regulating the conduct of games of chance by the Operation Managers, the Subcontractors and the staff involved, in particular the provisions aimed at combating fraud and crime, protecting minors,

protecting consumers and preventing addiction to gambling.

8.7. The Operator shall monitor international practices regarding the conduct of games of chance through gaming machines, including practices on Responsible Gaming and the protection of vulnerable social groups, evaluate them in relation to the development of the relevant market and the combating of illegal gambling, and recommend to the HGC relevant measures to be taken and procedures to be followed.

8.8. The natural persons who exercise the administration and/or management of the Operator shall have obtained a Suitability License in accordance with the provisions of the Gaming Regulation on the Suitability of Persons.

8.9. The Operator is obliged to immediately stop the operation of the Gaming Machine and to notify the HGC of the relevant events, the measures taken to deal with them, as well as the results of these measures, in case it detects:

a. Any intervention by an unauthorised person in the settings of a Gaming Machine or a Game;

b. A malfunction of a Gaming Machine which does not allow the proper running of the Games in accordance with the Regulation; and

c. Damage that raises reasonable concerns for the safe operation of a Gaming Machine.

8.10. The Operator should immediately notify the incident to the HGC and put the Gaming Machine out of order, in case it detects the removal, alteration, tampering or destruction of the label set forth in Article 6. The granting of a new label shall require the submission of a reasoned application for reissue to the HGC.

8.11. The Operator shall provide the following to the HGC:

8.11.1. At the end of each calendar quarter of the year, a report on the management and operation of the Games

which shall include a quantitative and qualitative form:

a. The forms and means of Commercial Communication undertaken and the corresponding expenditure;

b. Data relating to the recording of complaints, grievances, requests or queries from the public, the corresponding actions taken and the time taken to deal with them;

c. Data relating to shutdowns, malfunctions or failures of computer systems, gaming machines, software applications, structures, procedures and the corresponding actions and the time taken to deal with them; and

d. Any studies, surveys or reports concerning the market for Games, consumer preferences and behaviour, the conduct of Games conducted through Gaming Machines and their operation.

8. 11. 2. Access at all times to the bodies authorised by the HGC on its premises, on the premises of the Venues and on any system related to the conduct, supervision and audit of the operation of Gaming Machines, ensuring the provision of all requested data.

8.12. The Operator shall be obliged to keep electronic records of all operations and transactions related to the organisation, conduct and management of the Games. The records shall be maintained for at least ten (10) years in a medium that allows for the storage of the information and in a manner that meets the following criteria:

8.12.1. Any additions, corrections or other modifications, as well as the contents of the records prior to such corrections or modifications, shall be clearly identifiable.

8.12.2. Direct and easy access to these records shall be provided to HGC through the Supervision and Control Information System and/or the Intermediate Control System set out in Article 27.

8.12.3. Certain records may be kept in hard copy upon documented request of the Operator approved by the HGC. As regards the keeping of such records, the criteria set

out in paragraph 8.12.1, and in any case the Operator shall ensure the direct and easy access of the HGC to them, in accordance with paragraph 8.12.2.

Article 9

VENUE MANAGER

9.1. Each Venue shall appoint a Manager, who along with the Operator shall be jointly and severally responsible for compliance with the provisions of the legislation and this Regulation.

9.2. The Manager shall comply with and apply the terms and conditions specified in the Venue Certification.

9.3. The Manager is a natural person, aged between twenty-five (25) and sixty (60) years old, who is a permanent resident of Greece and meets the following requirements:

9.3.1. He/she is a citizen of a Member State of the European Union.

9.3.2. He/she has not been finally convicted of a felony or sentenced to any penalty for theft, embezzlement, fraud, unfaithfulness, receiving and disposing of the proceeds of crime, extortion, forgery, active or passive bribery, grievous or serious bodily injury, concealment of a crime, coinage offence, common dangerous crime, crime against personal freedom, crime against sexual freedom, crime of financial exploitation of one's sexual life, as well as crime provided for in the legislation on drugs, weapons, explosives and tax evasion.

9.3.3. He/she has not been finally convicted of any offence under the applicable gaming laws and regulations.

9.3.4. He/she possesses at least a secondary school leaving certificate or its equivalent and has completed the military service or has been legally exempted from it or is not subject to military service.

9.3.5. He/she knows Greek.

9.4. The Venue Manager shall:

9.4.1. Supervise the use of the Gaming Machines and take all necessary measures to ensure that persons who are under the age of

twenty-one (21) and Excluded Persons are not allowed to enter the Venue. In the case of Type F' Venue, the Venue Manager shall supervise the use of the Gaming Machines and take all necessary measures to prohibit such persons from accessing the gaming premises.

9.4.2. Discourage the unreasonable use of Games.

9.4.3. Encourage the Players to take breaks from playing Games.

9.4.4. Ensure that only certified Gaming Machines are installed in the Venue and that only certified Games are played.

9.4.5. Ensure that the Venue Certification Label and the signage referred to in Article 7 is displayed and maintained intact. In the event that he/she finds that this label has been removed, altered or destroyed, he/she must immediately notify the Operator and the HGC.

9.4.6. Provide unobstructed access to the Gaming Machines and Games installed in the Venue in which he/she has been appointed as the Manager to the authorised bodies of the HGC.

9.4.7. Immediately stop the operation of the Gaming Machine and immediately notify the Operator and the HGC, in case he/she detects:

- a. Any intervention by an unauthorized person in a Gaming Machine or Game;
- b. A malfunction of a Gaming Machine which does not allow the conduct of the Games in accordance with the provisions of the Regulations;
- c. Damage that raises reasonable concerns for the safe operation of a Gaming Machine; and
- d. The absence, removal, alteration or destruction of the label set forth in Article 6.

Article 10

SUBCONTRACTORS

10.1. The Operator shall supervise the activities of all its Subcontractors and be fully and completely responsible for their

acts and omissions in relation to the conduct of the Games.

10.2. The Operator shall keep a record of Subcontracts which includes a table with the particulars of the Subcontractor, the description of the scope of the Subcontract, the start and end time of the Subcontract and shall make the above information available to the HGC at the time and in the manner determined by the Authority.

Article 11

GRANTING OF A MANUFACTURER'S SUITABILITY LICENSE AND REGISTRATION IN THE REGISTER OF MANUFACTURERS

For the purpose of conducting the Games, the Operator shall use Technical Equipment and Materials provided by a person who has received a Manufacturer's Suitability License from the HGC and is registered in the relevant HGC Register in accordance with the provisions of the Gaming Regulation on the Suitability of Persons.

Article 12

GRANTING OF AN IMPORTER'S- SUPPLIER'S SUITABILITY LICENSE AND REGISTRATION IN THE REGISTER OF IMPORTERS- SUPPLIERS

In order to legally supply the Operator with Technical Equipment and Materials of one or more Manufacturers, each Importer is obliged to have received an Importer's Suitability License granted by the HGC and to be registered in the relevant Register of the HGC in accordance with the provisions of the Gaming Regulation on the Suitability of Persons.

Article 13

GRANTING OF A TECHNICIAN'S SUITABILITY LICENSE AND REGISTRATION IN THE REGISTER OF TECHNICIANS

In order to legally repair and maintain Technical Means and Materials, a Technician is required to hold a Technician Suitability Licence granted by the HGC and to be registered in the relevant Register of the HGC in accordance with the provisions of the Games Regulation on the Suitability of Persons.

Article 14

GAME CERTIFICATION

14.1. Any Game conducted through Gaming Machines shall be certified by the HGC.

14.2. The Certification shall be granted once the Manufacturer or the Importer-Supplier or the Operator has submitted a relevant application to the HGC.

14.3. The Certification shall include:

14.3.1. The particulars of the applicant; and

14.3.2. The unique trade name of the game to be certified (name and version number).

14.4. The application shall be accompanied by:

14.4.1. Proof of payment of the prescribed fee.

14.4.2. A declaration on honour by the person submitting the application or his/her legal representative, whose signature has been authenticated, stating that all data included in the application, as well as the one accompanying it, are true.

14.4.3. A Certificate of Conformity to the Technical Specifications and the Regulation, issued by a Certification Body in accordance with the provisions of paragraph 2.14 and Article 18 of this Regulation.

14.4.4. A sample of the game on a suitable digital medium, which should not be capable of being rewritten or subject to any tampering or alteration, accompanied by a certificate submitted by the Manufacturer confirming that the sample provided is an accurate representation of part of the game.

14.4.5. A Game Guide including at least the ways in which the game is played,

symbols, numbers and any other illustrations used, information on the prizes awarded, including but not limited to the maximum payout, winning combinations of symbols, numbers and other illustrations.

14.5. The HGC shall grant the Game Certification subject to the payment of the lump sum Certification fee provided for in paragraph 15.1.2.

14.6. In the case of an application for certification of a game consisting of more than one game (multi-game), the game shall be certified by a single act, and the lump sum fee provided for in subparagraph 15.1.2 shall be paid for each of the constituent games.

14.7. A new version of a Game or additions and modifications to an existing Game are considered a new Game which shall be certified in accordance with the procedures set out in the Regulation. This obligation includes those games which are components of multi-games that have already been certified by an act and which are intended to be marketed as stand-alone Games.

Article 15

FEES AND CHARGES FOR GAME CERTIFICATION

15.1. In order to obtain a Game Certification, the following fees shall be paid:

15.1.1. Fifty (50) euro fee upon submission of the application; and

15.1.2. A lump sum Game Certification fee of fifty (50) euro;

15.2. The procedure for payment of the prescribed fees and charges is described in Article 21 of the Regulation.

Article 16

GAMING MACHINE CERTIFICATION

16.1. Each Gaming Machine installed in a Venue should be certified by the HGC.

16.2. Such Certification shall be granted upon application by the Manufacturer or the Importer-Supplier or the Operator to the HGC.

16.3. For each Gaming Machine, the HGC shall issue the legal operation label set out in Article 6.

16.4. The application shall include:

16.4.1. The particulars of the applicant;

16.4.2. The number of the Manufacturer's Certificate of Conformity and/or the Importer's-Supplier's Certificate of Conformity granted for the Gaming Machine by the HGC;

16.4.3. The trade name and model of the gaming machine to be certified; and

16.4.4. The unique serial number assigned to the Gaming Machine by its Manufacturer.

16.5. The application shall be accompanied by:

16.5.1. Proof of payment of the prescribed fee;

16.5.2. A declaration on honour by the person submitting the application or his/her legal representative, whose signature has been authenticated, stating that all data included in the application, as well as the one accompanying it, are true.

16.5.3. Copies as provided for in Article 11(2) of Law 2690/1999 (Government Gazette 45/A) of the following documents:

- a. The EC-Declaration of Conformity;
- b. The Certificate of Conformity of the specific type of Gaming Machine to the Technical Specifications and the Regulation issued by a Certification Body in accordance with the provisions of paragraph 2.14 and Article 18 of the Regulation; and
- c. The operating manual of the Gaming Machine.

16.6. The HGC shall grant the Gaming Machine Certification subject to the payment of the lump sum Certification fee as set out in subparagraph 17.1.2.

16.7. In the event that additions and/or modifications are made to the elements of the equipment located in the area to which access is possible exclusively through the special, secure door of the Gaming Machine, the granted Certification shall automatically cease to be valid and the Gaming Machine

may be re-certified in accordance with the procedures provided for in the Regulation.

16.8. Should any of the elements set out in paragraph 16.5.3 or the elements of the equipment located outside the area to which access is possible, exclusively through the special secure door, change prior approval of the HGC is required so that the Gaming Machine continues to operate. The relevant application shall be accompanied by documentation of any changes and the fee referred to in paragraph 17.1.1.

16.9. Only certified Games are permitted to be installed in each Gaming Machine.

16.10. Disconnection of a Gaming Machine that is in operation in order to move it from Venue to Venue shall be notified to the HGC without delay.

16.11. It is not permitted to possess, use or dispose a Gaming Machine that has been withdrawn/disconnected without first being subject to one of the following conditions:

- a. Repair, when the Gaming Machine is moved to a repair facility;
- b. Storage, when the Gaming Machine is moved to a storage area;
- c. Withdrawal for the purpose of dismantling or recycling, when the Gaming Machine is moved to a dismantling site;
- d. Withdrawal for the purpose of exiting the Greek Territory, when the exit procedure of the Gaming Machine from the country is followed;
- e. Educational use, when the Gaming Machine is moved to a training area; and
- f. Testing, when the Gaming Machine is moved to a test site.

16.12. The HGC may by decision regulate and specify any necessary technical specifications for the application of the provisions of paragraphs 16.10 and 16.11.

16.13. A book shall be kept for each Gaming Machine, in which all accesses to it shall be recorded. The access referred to in the previous subparagraph shall not include access via the Communications Network. The accessing Technician shall record in that book his/her particulars, the date, time,

reason and result of the access, as well as a statement by the Technician that the access did not result in a change affecting the CE marking of the Gaming Machine or the certification of its conformity in relation to the Technical Specifications.

Article 17

GAMING MACHINE CERTIFICATION FEES

17.1. In order to obtain a Gaming Machine Certification, the following fees shall be paid:

17.1.1. Fifty (50) euro fee upon submission of the application.

17.1.2. A lump sum Gaming Machine Certification fee of fifty (50) euro.

17.2. The procedure for payment of the prescribed fees and charges is described in Article 21 of the Regulation.

Article 18

CERTIFICATES OF CONFORMITY - INFORMATION SYSTEM CERTIFICATION

18.1. The Technical Means and Materials under Articles 14, 16, 24, 25, 27, 28 and 34 shall hold valid certificates of conformity to the Regulation and the Technical Specifications, issued by a Certification Body pursuant to the provisions of paragraph 2.14 of this Regulation. Such certificates of conformity shall be submitted to the HGC by the Operator or the Manufacturer.

18.2. The Information Systems under Articles 24, 25 and 27 shall be certified by the HGC upon application by the Operator or the Manufacturer, accompanied by the certificates of conformity to the Regulation and the Technical Specifications. Any change to the above Systems shall be made in accordance with the provisions of the Gambling Regulation on Change Management in Central Information Systems (CIS).

18.3. The HGC may, at its discretion, request the completion of the certificates of conformity submitted.

Article 19

VENUE CERTIFICATION

19.1. Certifications for Venues with Gaming Machines are divided into three (3) categories as follows:

19.1.1. Type B' certification for Venues with Gaming Machines in exclusively gaming facilities;

19.1.2. Type E' certification for Venues with Gaming Machines on seagoing vessels engaged in international voyages; and

19.1.3. Type F' certification for OPAP S.A. betting shops, which offer the games of chance conducted by OPAP S.A. pursuant to the contract signed on 15.12.2000 between OPAP S.A. and the Greek State and Article 27(2a) of Law 2843/2000 (Government Gazette 219/A).

19.2. In each Venue:

19.2.1. It is prohibited to install and/or operate uncertified Games and Gaming Machines.

19.2.2. It is prohibited to conduct Electronic Technical - Amusement Games.

19.2.3. A Legal Operation Certification label shall be displayed in a prominent place at the entrance of the Venue indicating the code number and type of Venue Certification.

19.2.4. The Venue signage as referred to in Article 7 shall be displayed.

19.3. The Operator shall submit to the HGC for each Venue the Certification Codes of the Gaming Machines and the unique identifier of all systems and/or other equipment for the conduct, supervision and audit of the operation of Games. Any change to these details shall be notified to the HGC.

19.4. In order to certify a Gaming Machine Venue, the Operator shall submit an application to the HGC.

19.5. The application shall include the particulars of the Operator, the particulars of the person designated as the Manager, as well as the particulars of the person operating the Venue.

19.6. In order to obtain Type B' Venue Certification, the application shall be accompanied by:

19.6.1. A declaration by the legal representative of the Operator, whose signature has been authenticated, stating that:

a. All data included in the application, as well as the ones accompanying it, are true.

b. In the event that a Fire Safety Certificate has not been issued for the Venue to be certified in accordance with the applicable provisions, it shall be submitted immediately upon its issuance and in any case within twelve (12) months from the certification of the Venue.

19.6.2. Copies of the proof of ownership or lease of the Venue. In the case of a block of flats, copies of the regulation of the block of flats showing that the use of the proposed premises as a Gaming Venue is not prohibited are considered to be necessary. In the case there is no regulation of the block of flats, a declaration on honour shall be submitted by the manager of the block of flats or the owner of the Venue that there is no regulation of the block of flats and that the operation of the premises to be certified as a Gaming Venue is not prohibited.

19.6.3. Drawings of the premises for which the application is submitted as follows:

a. A certified copy of the floor plan including the topographical plan at a legible scale and the building permit stub, certified by the issuing body of the building permit. In the case of modification of the permit and/or regulation of the premises to be certified in accordance with the applicable provisions, all legal documents relating to the above modifications and regulations shall be submitted in addition.

b. A drawing by a licensed engineer or technical engineer at a legible scale of the floor plan of the premises to be certified, on which the individual areas, their square meters, including the installation area of the Gaming Machines, the restroom, the reception, the cash desk, the waiting area, as

well as the storage area have been clearly delineated.

19.6.4. A declaration by a licensed engineer or technical engineer, whose signature has been authenticated, stating that:

a. The area of the Venue shown on the floor plan is a legal main use area and meets the requirements set out in the applicable provisions for the operation of a Gaming Venue;

b. The net area of the premises where the Gaming Machines of the Venue are installed is the one provided for by the relevant provisions and the Regulation;

c. The fire protection measures provided for by the applicable legislation are complied with;

d. The distance from the main entrance of primary and secondary and boarding schools is in accordance with the provisions of paragraphs 5.10 and 5.11 (the exact distance in metres shall be indicated both in words and figures); and

e. The distance from existing casinos is more than five (5) kilometres, measured in a straight line.

19.6.5. For the person designated as the Operation Manager, the following shall be submitted:

a. Copies, in accordance with the provisions of Article 11(2) of Law 2690/1999 (Government Gazette 45/A) of the following documents:

aa. His/her identity card or passport;

bb. His/her secondary school leaving certificate or equivalent;

cc. A Certificate of Attainment in Greek of at least B2 level issued according to Presidential Decree No. 60/2010 (Government Gazette 98/A), in case he/she did not attend a Greek school; and

dd. A Registration Certificate of legal residence as per Article 8 of Presidential Decree No. 106/2007 (Government Gazette 135/A) for EU citizens.

b. A declaration on honour by the person designated as the Operation Manager,

whose signature has been authenticated, stating that:

aa. He/she is aware of the provisions of the Regulations and his/her obligation to operate the Venue in accordance with them.

bb. He has completed the military service or is not subject to military service or has been legally exempted from it.

cc. He/she has not been finally convicted of a felony or sentenced to any penalty for theft, embezzlement, fraud, unfaithfulness, receiving and disposing of the proceeds of crime, extortion, forgery, active or passive bribery, grievous or serious bodily injury, concealment of a crime, coinage offence, common dangerous crime, crime against personal freedom, crime against sexual freedom, crime of financial exploitation of one's sexual life, as well as crime provided for in the legislation on drugs, weapons, explosives and tax evasion.

dd. He/she has not been finally convicted of any offence under the applicable gaming laws and regulations.

19.6.6. Proof of payment of the prescribed fee.

19.7. In order to obtain a Type E' Venue Certificate, the application shall be accompanied by a copy of the Vessel Certificate of Registry, a floor plan of the VLTs' installation site and the supporting documents referred to in Articles 19.6.1, 19.6.5 and 19.6.6 above.

19.8. In order to obtain a Type F' Venue Certificate, the application shall be accompanied by:

a. A declaration referred to in paragraph 19.6.1 above;

b. A certificate of OPAP S.A. on the legal operation of the betting shop.

c. A drawing by a licensed engineer or technical engineer of the betting shop's floor plan showing the installation area of the VLTs.

d. The supporting documents referred to in paragraphs 19.6.4 items a' to c', 19.6.5 and 19.6.6 above.

e. Any other information requested by the HGC in order to ascertain the legal operation of the Venue which is to be certified.

19.9. The Venue Certification granted by the HGC is valid for an indefinite period of time subject to the payment of the annual fee for maintaining the registration in the Register.

19.10. Prior to the commencement of the commercial operation of the Venue, the Operator shall submit to the HGC the data referred to in paragraph 19.3, a Fire Safety Certificate in accordance with the applicable provisions and a declaration on honour of the Electrician-Installer, whose signature has been authenticated, stating that the electrical installation of the Venue meets all requirements, based on those provided by the legislation in force for the safe operation of the Gaming Machines that will operate in it. In the event that the Fire Safety Certificate has not yet been issued at the start of commercial operation, the Operator shall submit a copy of the application for issuing a Fire Safety Certificate submitted to the competent fire department. The Fire Safety Certificate shall be submitted to the HGC immediately upon its issuance and in any case within twelve (12) months as of the date of the Venue Certification, otherwise the Certification shall be automatically revoked.

19.11. Any change related to the Venue Certification shall be notified to the HGC by the Operator.

Article 20

FEES AND CHARGES FOR VENUE CERTIFICATION

20.1. In order to obtain a Venue Certification, the following fees shall be paid:

20.1.1. Seventy (70) euro fee upon submission of the application;

20.1.2. A lump sum Venue Certification fee of seventy (70) euro; and

20.1.3. An annual fee for maintaining the registration in the Register equal to one

hundred and twenty (120) euro per Gaming Machine. The annual fee shall be paid in advance for the first year of operation of the Venue and thereafter for each subsequent year of operation, as well as each time there is an increase in the number of Gaming Machines, regardless of the time remaining until the completion of the year.

Article 21

PAYING FEES AND CHARGES

21.1. The fees and charges provided for are resources of the HGC and shall be paid into a bank account designated by the Authority. Each deposit shall constitute a collection of the corresponding fee or charge and the corresponding deposit document shall constitute documentary evidence of collection, which shall explicitly state the reason for the deposit and the nature of the fee or charge.

21.2. Failure to pay the annual fee by the due date shall automatically result in the withdrawal of the Certification.

21.3. The specific details, the manner and time of payment of the prescribed fees and charges as well as specific issues for the application of the provisions of this Article shall be regulated by HGC decision.

CHAPTER C':

CONDITIONS FOR THE OPERATION AND CONDUCT OF THE GAMES

Article 22

GAME GUIDE

22.1. For each Game, the Game Guide shall be published and circulated in printed and/or electronic form by the Operator.

22.2. Each Game Guide shall state:

22.2.1. The commercial name of the Game;

22.2.2. Any matter relating to the participation of Players and, in particular, the minimum age of persons permitted to participate in Games conducted through Gaming Machines;

22.2.3. The ways in which the Game is played, symbols, numbers and any other illustrations used, information on the prizes awarded, including but not limited to the maximum payout, winning combinations of symbols, numbers and other illustrations, the achievement of which awards the Player a specific prize or free games;

22.2.4. Information about the prizes awarded, including but not limited to the maximum amount of prize money, combinations of symbols, numbers and other illustrations, the achievement of which awards the Player a specific prize or free games;

22.2.5. Information on the applicable tax on profits;

22.2.6. The name and address of the Operator conducting the Game, as well as its website;

22.2.7. The toll-free phone number for providing information and support services, as well as for making complaints;

22.2.8. The piece of information that both the Operator and the Gaming Machines have been certified supervised and audited by the HGC, as well as the contact details of the Authority;

22.2.9. The piece of information that the Regulation has been posted on the website of the Operator and on the website of the HGC;

22.3. The Game Guides shall be available in a prominent place in the certified Venue and are accessible by all appropriate means.

22.4. In the event that some pieces of information or data on the Games offered have not been included in the Game Guides or they contain errors, the Operator shall immediately notify the public of the correct and complete data.

22.5. Any change to the information contained in the Game Guide shall be promptly and clearly notified to the Players by the Operator.

Article 23

PAYOUT

23.1. The Operator shall ensure that the payout of the Games is applied in accordance with their Certification and the provisions of the applicable legal and regulatory framework.

23.2. The Operator shall ensure that the payout selected each time by the relevant Game rules applies to all certified Gaming Machines on which the Game is offered within the same Venue.

Article 24

CENTRAL INFORMATION SYSTEM

24.1. The Operator shall install a Central Information System (CIS) through which organisation, operation, conduct, monitoring, audit and management of the Games shall be carried out at a central level.

24.2. The Conduct of the Games shall be carried out exclusively through computer systems and subsystems connected to the Supervision and Control Information System.

24.3. Connection to the Supervision and Control Information System shall be made through the Intermediate Control System referred to in Article 27. The monitoring and audit time shall be determined in accordance with the provisions of the Technical Specifications.

24.4. The CIS shall perform the functions specified in detail in the Technical Specifications, have logical and physical security and audits, at all times, the operation of all its parts and subsystems to fully ensure:

24.4.1. Access control to its software programmes, stored data, files and data and all functionalities.

24.4.2. Its high availability operation.

24.4.3. The integrity, reliability, accuracy and fidelity of the stored information and data.

24.4.4. Real-time notification in the event of a malfunction, attempted breach or attempted tampering of any part of the System and the Gaming System Server.

24.4.5. The implementation of automated procedures to verify the integrity of the software installed on each subsystem, including the software of the Games installed on each Gaming Machine.

24.4.6. Monitoring and audit of the functionality of the Communications Network using protocols providing reliable and safe communication with the Gaming Machines.

24.4.7. Identifying and detecting hardware and software problems.

24.4.8. The continuous monitoring of the operation of the Gaming System Server parts as well as connections and disconnections of each Gaming System Server part.

24.4.9. The connections and disconnections of each piece of equipment, as well as failures, and preventive and corrective maintenance work on each of the System and Gaming System Server parts.

24.4.10. Monitoring of the issuance of only one Individual Card per Player and ensuring that no Player may participate in any Game without the use of an Individual Card.

24.4.11. The ability to implement and manage multiple interconnected progressive or system Jackpot modes on the Gaming Machines and Games in one or more certified Venues.

24.4.12. The ability to shut down and reset the operation of all parts of the Gaming System Server, as well as to activate and deactivate one or more Games in the CIS or the Gaming Machines.

24.5. The CIS shall manage data, information and records in accordance with the Technical Specifications, including, in particular, the following:

24.5.1. Games per Venue and per Gaming Machine.

24.5.2. Play Session, detailed and aggregated, and any winnings resulting from it.

24.5.3. Deposits, withdrawals, the Greek State related rights in the profits, the winnings paid out on a daily, weekly,

monthly and yearly basis, and the taxes on Player winnings, aggregated and detailed, per event and Play Session.

24.5.4. Data on the organisation, conduct, operation and management of Games, Gaming Machines and Venues (such as, but not limited to, commercial, statistical and security data) detailed and aggregated, as appropriate.

24.5.5. Financial data on Games, Gaming Machines and Venues by unit and in total on a daily, weekly, monthly and yearly basis from each Gaming Machine (displaying the subsets per Game).

24.5.6. Details on the application of the Responsible Gaming principles, monitoring and control of the limits set by the Player during his/her Gaming Activity.

24.5.7. Player exclusion details and information.

24.6. All of the above information shall be stored for a period of at least ten (10) years in an editable format.

24.7. Ensuring continuous access to the CIS from the Supervision and Control Information System is the sole responsibility of the Operator.

24.8. The physical location of the Backup Data and Recovery Systems should be different from the location where the CIS is installed.

24.9. The CIS shall have Certificates of Conformity with the Technical Specifications and the Regulation issued by a Certification Body. In case the Certificates of Conformity have been issued according to the Technical Specifications of other countries or the Certification Body that issues the Certificate of Conformity is accredited in the field of Technical Specifications of other countries, the CIS shall be dealt with in accordance with the provisions of paragraph 2.14.

24.10. Scheduled or unscheduled upgrades and changes to both the equipment and software of the CIS shall be notified immediately to the HGC in accordance with the provisions of the Regulation, the

Technical Specifications and the Gaming Regulation on the Management of Changes to the CIS.

24.11. The Operator shall be exclusively responsible and obliged to provide the HGC with remote and/or on-site access to the CIS and its individual (sub)systems and the data and information held thereon, in the manner and at the time specified by the Authority.

24.12. The Operator shall bear all costs related to the connection of the CIS with the Intermediate Control System referred to in Article 27 and the proper operation of this connection.

Article 25

GAMING SYSTEM SERVER

25.1. The running of each Game conducted through Gaming Machines requires the Operator to install one or more Gaming System Servers. Each Gaming System Server shall include at least:

25.1.1. Gaming Machines;

25.1.2. A Communications Network for real-time communication between the Gaming Machines and the CIS through the Gaming System Server;

25.1.3. A Gaming Management System;

25.1.4. A Backup Data and Recovery System; and

25.1.5. A Player Management System.

25.2. Each Gaming System Server shall ensure at least the following basic, functional and operational capabilities:

25.2.1. Real-time communication between all parts of the system (Gaming Management System, Player Management System, Communications Network, Gaming Machines, etc.) and their high availability of operation. All parts of the Gaming System Server are synchronised from a single source, which uses Universal Time and Time Coordinates (UTC) for its timing;

25.2.2. Proper operation of certified Games;

25.2.3. Real-time monitoring of the security and integrity of all components of the Gaming System Server and the

identification of any security breach (such as unauthorised opening of a Gaming Machine or coin acceptor port, tampering with a meter, etc.) at a Gaming Machine, Communications Network, etc level;

25.2.4. Access control to its various software programmes, stored data, files and, in general, to all functionalities;

25.2.5. The integrity, reliability, accuracy and fidelity of the stored data in its records;

25.2.6. The integrity, reliability, accuracy and fidelity of all data exchanged (sending and receiving data) using the CIS

25.2.7. The ability to implement and manage multiple interconnected Jackpot modes of all or certain Gaming Machines and Games, in the same or in several Venues; and

25.2.8. The ability to identify Gaming Machines and their software and installed Games using digital seed and signature techniques.

25.3. In case the Gaming System Server supports a validation function for validating special machine-printed receipts, which represents Credits, used for redeeming Credits, the requirements of the Technical Specifications shall be met. In particular, the validation system for the validation of special receipts shall:

25.3.1. Have an algorithm for generating validation numbers or seeds for redeemable special receipts.

25.3.2. Store in a database all relevant information about the special receipt (validation number, date and time of issue, monetary value, status of the special receipt, date and time of expiry, identity of the certified Gaming Machine from which it originated, etc.) retrieved from the system based on the secure communication protocol used.

25.3.3. Ensure the correct redemption of the special receipt, depending on the secure communication protocol used.

25.4. For each Gaming System Server facility of the Operator, the HGC shall be informed of the exact implementation

schedule and Technical Specifications. The Technical Specifications shall provide the HGC with a full picture of how all parts of the Gaming System Server will operate in terms of software, hardware and other equipment, the techniques by which the connection to the Gaming Machines will be ensured, as well as how the uninterrupted and secure operation of and access to the Gaming System Server will be ensured.

25.5. All the parameters of the Gaming System Server, which determine the way the Games are operated and conducted on the Gaming Machines, the respective payout per Game, the implementation of the security and access policy in the Gaming Machines, as well as the overall operation of the Gaming System Server, shall be sent to the HGC to ensure that both the relevant laws and Regulation are adhered to.

25.6. The operation of each Gaming System Server shall fully meet the requirements for single management of all data and cover directly and efficiently the need to exchange all required information between the Gaming System Server, the Venues and the Gaming Machines. The HGC must, at all times, be able to ascertain the proper functioning of all parts of the entire Gaming System Server. The monitoring of the operation of each Gaming Server System shall be carried out through specially designed screens and properly designed reports, so that any change in the normal operation of the Gaming System Server, malfunctions and emergencies can be immediately identified.

25.7. Scheduled or unscheduled upgrades and changes to both the equipment and software of the Gaming System Server shall be notified immediately to the HGC in accordance with the provisions of the Regulation, the Technical Specifications and the Gaming Regulation on the Management of Changes to the CIS.

25.8. The physical location of the Backup Data and Recovery Systems shall be

different from the location where the Gaming System Server is installed.

Article 26

COMMUNICATIONS NETWORK

26.1. The Communications Network connects the CIS via the Gaming System Server to all the Gaming Machines in a Venue. Each Communications Network shall provide full security to ensure:

26.1.1. Reliable, accurate and faithful transmission between the Gaming System Server and the Gaming Machines, and all data necessary for the proper operation of the Games;

26.1.2. The high availability operation of the overall system;

26.1.3. The protection of privacy and data transmitted; and

26.1.4. The authenticity of the sender and the recipient. No communication should be possible between a Gaming System Server and the Gaming Machines of any unrelated and unauthorised computer.

26.2. More generally, for the smooth, solvent, reliable and safe conduct of Games conducted through Gaming Machines:

26.2.1. The accurate and faithful transmission through the Communications Network of all kinds of data (e.g., financial, commercial, security, etc.) as well as the non-adulteration or alteration of such data shall be ensured.

26.2.2. All components and the necessary equipment of the Communications Network shall meet the highest security standards in accordance with international practice applicable to Games and Gaming Machines.

26.2.3. The continuity of the connection, including the use of the Backup Data and Recovery System shall be ensured.

26.2.4. The computer network of the Gaming Management System shall have technical characteristics compatible with today's broadband technology and shall allow communication between existing interfaces via VPN (Virtual Private Networks).

26.2.5. Communication protocols concerning the communications between all parts of the system shall guarantee the confidentiality of the dialogues using cryptographic algorithms, with the exception of those parts located in the same data centre (for example servers in the same or adjacent bases or in the same or adjacent structural supports).

26.3. The Communications Network must operate in a way that does not affect the compliance of the conducting systems with which it interoperates to the provisions of the Regulation and the Technical Specifications.

Article 27

SUPERVISION AND CONTROL INFORMATION SYSTEM – INTERMEDIATE CONTROL SYSTEM

27.1. In order to interconnect the computer systems and subsystems with the Supervision and Control Information System so as to ensure the conduct of the Games, the Operator is obliged to implement the Intermediate Control System.

27.2. The Intermediate Control System shall consist of the following (sub)systems:

27.2.1. A Data Capture System which performs the functions of extraction, collection and transformation of the CIS data.

27.2.2. A Data Sealing System which shall perform the functions of data batching, timestamp, encryption and data transfer.

27.2.3. A Safe which shall perform the function of the final storage of data and the access of the HGC to the structured data models in the manner and at the time specified by the Authority.

27.3. The Intermediate Control System shall ensure the integrity, authenticity and continuous availability of the data collected.

27.4. The data collected and stored in the Safe shall follow the data models and standard reports defined by the Authority in accordance with the Regulation and the Technical Specifications.

27.5. The Operator shall feed to the Intermediate Control System the details of the Gaming Activity and the transactions relating to the Conduct of the Games that take place between the Player, the Operator and the Payment Service Provider.

27.6. The Intermediate Control System shall be hosted in a Data Centre within the Greek territory, which has strong operational characteristics in terms of service availability, security and tolerance against damaging actions and business continuity. The operational characteristics of the hosting centre are described in the Technical Specifications.

27.7. The alternative storage site for the main Safe shall be hosted at a Data Centre within the Greek territory at a distance of at least twenty (20) kilometres from the Intermediate Control System and shall be synchronized with it every thirty (30) minutes at the latest, using a secure connection intended solely for this purpose.

27.8. The Intermediate Control System shall have a Certificate of Conformity in accordance with the provisions of the Regulation and the Technical Specifications.

27.9. Scheduled or unscheduled upgrades and changes to both the equipment and software of the Intermediate Control System shall be notified immediately to the HGC in accordance with the provisions of the Regulation, the Technical Specifications and the Gaming Regulation on the Management of Changes to the CIS.

27.10. The Operator shall provide the HGC with remote and/or on-site access to the Intermediate Control System, as well as to the data and information held therein.

27.11. The requirements for the installation, management and operation of the Intermediate Control System are described in detail in the Technical Specifications.

27.12. The Operator shall bear all costs related to the installation and proper functioning of the Intermediate Control System.

Article 28

RANDOM NUMBER GENERATOR

28.1. Numbers generated by the RNG and represented in a particular form (e.g., card, ball, etc.) shall be used in accordance with the rules of the Game.

28.2. The RNG shall have a valid Certificate of Conformity with the Technical Specifications and the Regulation issued by a Certification Body. In case the Certificate of Conformity has been issued according to the Technical Specifications of other countries or the Certification Body that issues the Certificate of Conformity is accredited in the field of Technical Specifications of other countries, the RNG shall be dealt with in accordance with the provisions of paragraph 2.14.

Article 29

JACKPOT MODE

29.1. The Jackpot mode is distinguished:

29.1.1. Depending on how it is implemented, it is divided into Game Activated Jackpot and System/Mystery Activated Jackpot.

29.1.2. Depending on where it takes place, it is divided into Venue Jackpot and Multi Venue Jackpot.

29.1.3. Depending on the way the amount of money is formed, it is divided into Fixed Jackpot or Progressive Jackpot.

29.2. The conduct of a Venue Jackpot is allowed upon approval of the HGC. The conduct of a Multi Venue Jackpot is allowed by decision issued by the Minister of Finance upon relevant recommendation of the HGC.

29.3. The Game Activated Jackpot, if applicable, shall be awarded through the Gaming Management System to the Player who achieves the top prize in one of the Games participating in the Jackpot on the payout of that Game. In this case the Player shall win both the top prize of the Game and the Jackpot prize money. Games participating in this Jackpot category shall have the same mathematical profile and the

same top prize probability that leads to the Jackpot award.

29.4. The Gaming Management System shall be informed in real-time by the Machine that has achieved the highest prize and then assign the Jackpot amount to it while simultaneously updating all Jackpot information screens in the participating Venue or Venues. In the event that more than one Gaming Machine achieve the maximum Game prize and therefore the Jackpot, before the Gaming Management System completes the processing of the data and the allocation of the Jackpot to a Gaming Machine, this amount of money shall be equally distributed to these Gaming Machines. The time required to administer the prize money allocation and update the screens shall not exceed a period of thirty (30) seconds.

29.5. The Venue Jackpot shall be conducted according to rules and procedures set out in its terms and conditions and shall be awarded to Players under the terms and conditions set out in its approval decision.

29.6. The maximum Venue Jackpot shall not exceed the amount of fifty thousand (50,000) euro.

29.7. Jackpots that are not controlled by the Operator's CIS and are not linked to the Operator's Gaming System Server shall not be allowed.

29.8. The criteria for the distribution of the funds allocated to each System Activated Jackpot shall be set out in the Gaming Management System.

Article 30

JACKPOT MODE TERMS AND CONDITIONS

30.1. Any Jackpot mode shall meet the Technical Specifications and also, where applicable, the requirements of this Article.

30.2. For each Game conducted through Gaming Machines and participating in a Jackpot, the following features shall be certified in detail:

30.2.1. Multi-level Jackpot numbering;

30.2.2. Details of the Jackpot design depending on how it is implemented;

30.2.3. Conditions relating to the achievement of a win in each Jackpot;

30.2.4. Money amount to restart the next Jackpot;

30.2.5. Maximum Jackpot amount;

30.2.6. Participation rate in the progressive increase of the Jackpot amount;

30.2.7. How the money collected, after the maximum Jackpot amount is reached, is managed to be channelled into Jackpot pools;

30.2.8. Expected activation/promotion price levels;

30.2.9. Secondary percentages channelled into Jackpot pools; and

30.2.10. Payment methods.

30.3. The Venue Jackpot mode and the Multi Venue Jackpot mode shall meet the following conditions:

30.3.1. The Jackpot amount may either be a fixed amount of money or may be progressively increased depending on the amount of money played and offered on more than one Gaming Machine of the same or more Venues. Simultaneous Jackpot operation of multiple payout levels is allowed.

30.3.2. Each Gaming Machine participating in a Jackpot shall be uniquely identified by the Operator. This information shall be readily accessible to any audit by the HGC.

30.3.3. The progressive counter of the Jackpot mode shall display the total amount of money within thirty (30) seconds of the time the amount of money is refreshed in the CIS or Gaming System Server. If there is a specific refresh rate for the progressive counter, it shall display the total amount of money as soon as it receives an update from the CIS or Gaming System Server.

30.3.4. The method by which the values of the Jackpot mode parameters are created or modified shall be reliable. The Jackpot shall be monitored and controlled by the CIS, but may be controlled by any appropriate

system connected to the CIS that is certified for this purpose and which, inter alia:

- a. Controls all communications.
- b. Calculates the values of progressive wins.
- c. Appropriately displays the values of such winnings together with the relevant progressive counters.

30.3.5. Each Venue participating in the Jackpot mode shall have the special information screen referred to in paragraph 32.2 of the Regulation.

30.3.6. In any case of Progressive Jackpot, the current Jackpot value shall be kept back in order to be available to the Players at any time.

30.3.7. Upon notification to the HGC by the Operator, an ongoing Progressive Jackpot may be removed. In this case, the respective increment amount in addition to the starting amount shall be transferred and added to the next or another running Progressive Jackpot.

30.3.8. Upon notification to the HGC by the Operator, the amount (value) of the Progressive Jackpot may be reduced. In this case, the cash value by which the total amount (value) of the Jackpot is reduced shall be added to the next or another running Progressive Jackpot.

30.3.9. Any part of the value of the Jackpot that is not paid to the Player due to exceeding the maximum limit of the Jackpot in accordance with the provisions of paragraph 29.6 shall be carried forward and added to the next or another running Progressive Jackpot in accordance with the provisions of paragraphs 30.3.7 and 30.3.8.

Article 31

JACKPOT OPERATION APPROVAL

31.1. The Operator shall submit to the HGC an application for approval to conduct a Jackpot accompanied by the data and information referred to in Articles 29 and 30 of the Regulation as well as a Certificate of Conformity to show compliance with the Technical Specifications and the Regulation issued by a Certification Body.

31.2. The conduct of a Venue Jackpot shall be approved by the HGC no later than thirty (30) days after the submission of the relevant application to the HGC. If the above deadline lapses, approval of its conduct shall be presumed.

31.3. Recommendation for the issuance of the decision provided for in paragraph 29.2 by the Minister of Finance for the approval of a Multi Venue Jackpot shall be submitted by the HGC no later than thirty (30) days following the submission of the relevant application.

31.4. The HGC may at any time, prohibit the operation of a Jackpot that has not been approved or found to be conducted in a manner contrary to the terms of the approval, to the applicable provisions, the Regulations and the Technical Specifications.

Article 32

INFORMATION AND INSTRUCTIONS ON THE GAMING MACHINES AND VENUES SCREENS

32.1. Each piece of information displayed on the screen of the Gaming Machines shall be written in such a font size and remain there for a period of time that the Player can comfortably read it. The information that should be available at all times to the Player via the Gaming Machine screen is as follows:

32.1.1. The trade name of the Game in which the Player takes part in.

32.1.2. The amount of money the Player chooses each time in order to participate in a Game.

32.1.3. The outcome of the last Game Cycle at the time of its completion (e.g., deck of cards, symbols combination, illustrations etc) until the next Cycle begins or the Player stops playing the Game or he/she requests cash out.

32.1.4. The amount of money from the last Game Cycle until the next Cycle begins or until the Player stops playing the Game or he/she requests cash out.

32.1.5. The valid Player's options during the last Game Cycle until the new Cycle begins or the prize money changes.

32.1.6. The Player's available balance.

32.2. In each Venue, which conducts a Venue Jackpot or participates in a Multi Venue Jackpot, there shall be special information screens for the adequate information of the Players independent of or as part of the Gaming Machines. Such displays throughout the Jackpot operation shall be connected to the Gaming System Server and shall display at least the following information:

32.2.1. The current date and time;

32.2.2. The name of the Jackpot mode;

32.2.3. The Jackpot amount that should be updated within thirty (30) seconds of its calculation by the Gaming System Server; and

32.2.4. The event of a Jackpot award, when it occurs in a manner perceived by the Players. At least the following information shall be displayed for each award:

a. The exact amount of money to be awarded;

b. The code of the Gaming Machine on which it is being awarded;

c. The code of the Gaming Machine/Venue where it is being awarded.

d. The date and time of the award.

32.3. The Jackpot award shall be accompanied with a discreet audio signal and its duration on the screen shall not be less than thirty (30) seconds.

The Jackpot award shall be accompanied by a distinct sound signal and the duration of the award details on the screen shall not be less than thirty (30) seconds.

32.4. In case the Jackpot mode is interrupted for technical or other reasons, the screen shall display a message (e.g. "Temporary Jackpot interruption") until it is restored.

Article 33

COMMERCIAL COMMUNICATION

33.1. The Commercial Communication of the Game shall be carried out in accordance with the provisions of the Gaming Regulation on Commercial Communication regarding Games of Chance and the relevant obligations of the Operator in accordance with the provisions of Article 9 of the Concession Agreement.

33.2. It is not permitted to send commercial communication material to Excluded Players. This prohibition shall commence twenty-four (24) hours after the Player is placed in exclusion.

33.3. The HGC may demand the direct suspension of any commercial communication action that is contrary to the applicable provisions, the Regulation and the Concession Agreement.

CHAPTER D':

CONDITIONS FOR PLAYERS' PARTICIPATION IN THE GAMES

Article 34

INDIVIDUAL PLAYER CARD

34.1. Participation in Games conducted through Gaming Machines requires the issuance of an Individual Player Card. Only one Individual Card shall be issued to each Player.

34.2. The Individual Player Card shall be issued by the Operator, upon request, at all Venues and at the headquarters of the Operator.

34.3. Individual Player Cards may not be issued to persons under the age of twenty-one (21) and to Excluded Persons.

34.4. The Individual Player Card shall:

34.4.1. Be detected by the CIS upon insertion in each Gaming Machine.

34.4.2. Contain only the strictly necessary data for its identification by the CIS, in order to identify the Player.

34.4.3. Be secured with a Personal Identification Number (PIN) which shall be entered by the Player before participating in a Game.

34.4.4. Clearly indicate, on the front side of the card, the Player service line number and helpline number in the event of problem gambling.

34.4.5. Have the technical characteristics specified in the Technical Specifications.

34.5. The data preserved in the memory of the Individual Player Card shall be notified by the Operator to the HGC.

34.6. The terms for issuing, managing and operating the Individual Player Card as described in the Regulation shall be included in the Accession Agreement and shall include at least the following information:

34.6.1. The terms and conditions for issuing the Individual Player Card;

34.6.2. The process for issuing and cancelling the Individual Player Card;

34.6.3. The process for notifying any change to the personal details;

34.6.4. The way to use the Individual Player Card along with any limitations of its use.

34.6.5. The process for replacing the Individual Player Card in the event of loss, theft or malfunction.

34.6.6. The conditions for unilateral deactivation of an Individual Player Card by the Operator.

34.6.7. The use of individual data and the protection of personal data in accordance with the applicable provisions.

34.6.8. The customer service line number and helpline number of the Gaming Operator.

34.7. Adults who have reached age twenty-one (21) and Non-Excluded Persons may apply for the issuance of an Individual Player Card by presenting the required documents at any Venue. The application shall be a declaration on honour and shall include at least the following:

- a. Full name and father's first name;
- b. Date of birth;
- c. Valid ID card or passport number;
- d. Permanent residence address; and
- e. Address in which the Individual Player Card shall be sent.

34.8. The application submitted for the issuance of an Individual Player Card shall be accompanied by an Identity Card or Passport copy and any other supporting documents in accordance with the applicable provisions, the Accession Agreement and the company policy followed by the Operator.

34.9 The data of the applicant shall be entered in the Player Database by the Operator, who shall certify the accuracy of the data entered and of the supporting documents accompanying the application.

34.10. The Individual Player Card shall be issued upon signing of the Accession Agreement.

34.11. Any rejection of a request for the issuance of an Individual Player Card shall be justified and in writing by the Operator. Any objections of the applicant to the rejection of the request shall be submitted in writing to the Operator within five (5) working days.

34.12. The Individual Player Card shall be sent by registered mail to the Player's permanent residence address or to the address indicated in the application form or delivered to the Venue immediately after the signing of the Accession Agreement.

34.13. The application for an Individual Player Card and the accompanying documents shall be kept by the Operator in electronic format for at least ten (10) years.

34.14. The Individual Player Card shall be cancelled upon application of the Player and thus the Accession Agreement shall be terminated.

34.15. The HGC may prohibit the issuance of the Individual Player Card or order its revocation when the person applying for its issuance or the Player:

- a. Has been finally convicted of a felony or sentenced to any penalty for theft, embezzlement, fraud, unfaithfulness, receiving and disposing of the proceeds of crime, extortion, forgery, active or passive bribery, grievous or serious bodily injury, concealment of a crime, coinage offence, common dangerous crime, crime against

personal freedom, crime against sexual freedom, crime of financial exploitation of one's sexual life, as well as crime provided for in the legislation on drugs, weapons, explosives and tax evasion.

b. Has been finally sentenced to any penalty for a crime provided for in the applicable legislative and regulatory framework on gambling.

34.16. The Operator shall immediately cancel the Individual Player Card upon the Player's declaration of its theft, loss or destruction or upon the HGC decision in accordance with paragraph 34.15.

Article 35

ACCESSION AGREEMENT - CONDITIONS FOR THE PARTICIPATION OF PLAYERS

35.1. Participation in the Games is only permitted if the Player has accepted the Accession Agreement in paper form and the Individual Player Card has been issued. In any case, the Accession Agreement shall also be available to the Player via the Gaming Machine provided that this function is supported electronically.

35.2. The Accession Agreement shall be concluded once and shall include at least:

35.2.1. The terms and conditions for participation in the Games;

35.2.2. The terms for issuing, managing and operating the Individual Player Card;

35.2.3. The rules regarding the conduct of Players in the Venues;

35.2.4. The way to attribute winnings;

35.2.5. The terms, conditions and, where applicable, the deadline for the submission of complaints or reports by the Players. This time limit may not exceed the time frame required to retain any records, information and data necessary for the investigation of the complaint or report;

35.2.6. The reasons the Operator terminated the Accession Agreement;

35.2.7. The terms and conditions for excluding and information regarding the

implementation of Responsible Gaming principles;

35.2.8. The way to solve/settle any dispute;

35.2.9. The obligations the Operator has regarding the process of personal data, the information that such process is being conducted according to the General Data Protection Regulation [Regulation (EU) 2016/679] and Law 4624/2019 (Government Gazette 137/A), the Terms on Personal Data Process and the Operator's Privacy Policy, as well as the contact data of the person in charge for the protection of data.

35.3. The information that the Player accepts the Accession Agreement and the Special Terms on Personal Data Protection, understands, commits and accepts to participate in the Games under the conditions governing both such games and the Operator's company policies and that he/she is aware of the fact that the Games are conducted pursuant to the applicable legislative and regulatory framework.

35.4. The Accession Agreement and any amendment shall be approved by the HGC.

35.5. The data regarding the acceptance of the Accession Agreement shall be kept by the Operator in an electronic format for ten (10) years.

35.6. In order to participate in the Games, the Player must necessarily insert his/her Individual Player Card in the slot of the Gaming Machine in order for his/her Card to be checked and read.

35.7. The Player shall participate in the Game he/she will choose by the following means:

35.7.1. In cash;

35.7.2. Using a voucher;

35.7.3. Using a Prepaid Card; and

35.7.4. By reinvesting Credits

35.8. The Operator shall define the acceptable types of Prepaid Card by which a Player may participate in the Games conducted on the Gaming Machines.

Article 36

PLAYER WINNINGS – WINNING CERTIFICATE

36.1. Any winnings resulting from the outcome of each Game Cycle shall be added as credits to the Player's available balance immediately after the completion of that Cycle. The credits for the commencement of each Game Cycle shall be deducted from the Player's available balance upon commencement of that Game Cycle.

36.2. Upon completion of each Play Session, any winnings shall be paid directly to the Player either by crediting his/her Online Account or by issuing a special receipt by a Gaming Machine to be cashed or in cash after the amount of the applicable tax has been withheld and returned to the Greek State. The exact procedure for the reimbursement of the winnings to the Players shall be defined by the Operator in the Accession Agreement.

36.3. The available balance of the Online Player Account shall be redeemable at any time. It is forbidden to freeze the amount of money for participation in the next Game Cycle, as well as not to pay the amount of winnings because it is lower than a certain amount.

36.4. A winnings certificate shall be issued by the Operator to the Players in accordance with HGC decisions for the implementation of measures regarding the prevention of money laundering from illegal activities, issued pursuant to paragraph 3(f) of Article 28 of Law 4002/2011.

Article 37

PLAYER EXCLUSION

37.1. The Operator shall be obliged to provide the Player with the option to temporarily or indefinitely exclude himself/herself from participating in Games and it shall ensure that the Player does not participate in Games after being excluded.

37.2. The exclusion of indefinite term shall be set by the Player. In case the Player requests his/her exclusion of indefinite term, the Operator shall immediately deactivate the

Online Player Account and terminate the contractual relationship. The Online Player Account may be reactivated upon request of the Player when at least one (1) year has elapsed from exclusion and after the Accession Agreement has been re-concluded and the processes described in Articles 34 and 35 have been completed.

37.3. The temporary exclusion shall be set by the Player and apply for a period of at least one (1) month. The Operator shall be obliged to immediately deactivate the Online Player Account and keep such status during the period of temporary exclusion.

37.4. The Player shall have the option to temporarily or indefinitely exclude himself / herself in one of the following ways:

37.4.1. By calling the Operator's service line and following an identity check.

37.4.2. By filling in the special form at the certified Venues and following an identity check.

37.4.3. By visiting the relevant "Personal User Interface" of the Gaming Machine filling in his/her personal data, if such possibility is provided.

37.5. The Operator shall immediately enter in the Player Database the details of the Excluded Player and the data describing the exclusion and shall immediately enter the Player into exclusion status.

37.6. The Operator provides the Player through the relevant "Personal User Interface" of the Gaming Machine the technical possibility by pressing the day stop button to interrupt the Play Session and to be excluded from participation in the conduct of the Games until 00:00:00 of the same calendar day.

37.7. The Operator shall inform the excluded Player in accordance with paragraph 37.2 and 37.3 and in the case of five (5) day stops within a period of one year, which he/she can receive counselling and support from a rehabilitation centre in Greece

37.8. The Operator shall inform the HGC via the Intermediate Control System (Safe)

providing information concerning the excluded persons in accordance with par. 37.2 and 37.3.

37.9. Prior to issuing an Individual Player Card the Operator shall check the Player Database in order to verify that the person applying for an Individual Player Card is not in an exclusion status otherwise the application shall be rejected.

CHAPTER F': MEASURES TO PROTECT THE PUBLIC AND THE PLAYERS

Article 38 MEASURES TO PROTECT THE PUBLIC

38.1. Persons under the age of 21 and Excluded Persons are not permitted to access Venues where Games are conducted through Gaming Machines. In the type F' Venues the aforementioned prohibition shall apply regarding the access to the Venue and the operation of Games of Chance through Gaming Machines. The same prohibition shall also apply to the enclosed area of type F' Venues and in the room referred to in paragraph 5.19.2 herein.

38.2. The Operator and the Operation Managers shall prohibit persons referred to in paragraph 38.1 to enter and stay in these Venues and to display inside and outside of the Venues relevant prohibition signs. Access to these Venues is permitted upon showing an identity card or a passport.

38.3. Persons who have reached age 21 are not permitted to enter and stay in the aforementioned Venues when they accompany minors or persons who are under the age of 21.

Article 39 MEASURES TO PROTECT THE PLAYERS – ELIGIBILITY CONDITIONS

39.1. Participation in Games should be the result of one's free and independent personal choice and should also be done

without incitement or exhortation (unstimulated gambling). Players may obtain information concerning the rules governing the playing of games, the win odds for each of them as well as information on where they can turn into in case of addiction. The respective information must be provided by the Operator at the Venues, on the Operator's websites, as well as in any other appropriate means.

39.2. The Operator shall ensure that the Player sets daily, weekly and monthly limits on the expenditure and time of his/her participation in the Game and that the individual restrictions set by the Player are applied for the period of time for which they were set.

39.3. The Player is required to set a Daily Loss and a Session Loss for his/her participation in the Game, at the beginning of the first Play Session after his/her registration.

39.4. Daily Loss per Player shall be valid from 00:00:01 to 00:00:00 of the same calendar day. Upon completion of the Game Cycle as a result of which the Player's Daily Loss exceeds the Daily Loss, the Player shall be excluded from participating in Games until 00:00:00 of this calendar day. During the same calendar day the Player shall be given the option to set his/her Daily Loss or to reduce the Daily Loss he/she has set. Reducing the Daily Loss shall apply and be effective immediately. Any Credits regarding the aforementioned limits for participating in Games shall under no circumstances be transferred to a following calendar day.

39.5. Regardless of the Daily Loss in accordance with paragraph 39.2, the Operator is required to terminate the Play Session immediately upon completion of the Game Cycle in which the Player exceeds the Play Session Loss.

39.6. The Player is obliged to set at the beginning of the first Play Session upon his/her registration the total maximum time of participation in the Games at the level of a day (from 00:00:01 to 00:00:00 of this

calendar day) and may subsequently set the total maximum time of participation in the Games at the level of a day, a week (from Sunday to Saturday) and/or a calendar month (from the first to the last day of the month) in accordance with paragraph 39.2 herein. In the event that the Player's total participation time exceeds one of the above time limits and after the last Game Cycle during which the maximum participation time set by the Player has been completed, the Operator shall exclude the Player from participating in the Games for the period of time covered by the restriction set by the Player. Any remaining participation time under the limits will not be carried over to the next period (day, week or month). The reduction of the time limit set in each case shall apply and be effective immediately.

39.7. The Operator shall notify the Player with a message displayed on the main screen for such time as to be perceived as interference in the conduct of the Game and to be adequately perceived by the Player as soon as the Player exceeds 80% of the respective limit referred to in paragraph 39.3 and 39.6. The message shall warn the Player that:

- a. He/she has exceeded the above percentage.
- b. Once 100% of the applicable limit has been reached, the Play Session will be compulsorily interrupted.
- c. He/she may reduce his/her loss limits from the special menu of the Gaming Machine.

39.8. The Online Player Account records the date, time, Gaming Machine, amount of money of each Play Session, winnings, current balance of the Player's available funds as well as the limits and restrictions set out in this Article.

39.9. The Operator shall provide information to the Player regarding:

39.9.1. Participation in the Games, in such a way that he/she can make decisions with full knowledge of the rules of the Games he/she chooses to participate in.

39.9.2. The risks he/she may be exposed due to excessive gambling, such as loss of money and addiction. In this context, each Gaming Machine shall display on its main screen:

- a. responsible gambling messages, in such a way and for such a time as to be perceived as interference in the conduct of the Game and to be adequately perceived by the Player; and
- b. the current result (winnings or losses) from the Play Session and the time of participation of the Play Session.

39.9.3. The existing organizations that provide help and support to addicted Players and their families.

39.10. The Operator, in addition to the other obligations provided for herein, shall:

39.10.1. Make available in each Venue a Game Guide for each Game, in accordance with the specific provisions referred to in Article 22 of the Regulation.

39.10.2. Make available in each Venue leaflets on Responsible Gaming, including service line numbers, the exclusion procedure, etc.

39.10.3. Operate a helpline regarding issues related to the responsible conduct of certified Games and supporting Players and in particular vulnerable social groups.

39.10.4. Provide in each Venue self-assessment tools for the Player regarding his/her attitude towards Games.

39.10.5. Display in each Venue in a prominent place where Games are played, its express commitment to the principles of Responsible Gambling referring to the negative consequences of engaging in reckless play, advice on Responsible Gambling and related information, in addition to printed material, provided by the Operator and the appropriately trained staff.

39.10.6. Train the Operation Managers and the staff of the Venues so they are able to:

- a. Inform the Players and any interested party about the option of exclusion or restrictions on participation in the Games.

b. Assist Players and/or authorised persons in order to deal with addiction and problem gambling.

39.11. The HGC may by decision impose on the Operator preventive, restrictive and corrective measures for the protection of minors and vulnerable social groups, in accordance with the provision of paragraph 3(e) of Article 28 of Law 4002/2011 (Government Gazette 180/A).

Article 40

PLAYER INFORMATION AND CREDIBILITY

40.1. The Operator shall ensure that any piece of information in any form provided to the consumer and the Players is true, accurate and comprehensible and does not contain or is not linked in any way to any piece of information that could be considered misleading.

40.2. The HGC shall collect and assess the Gaming Activity data.

Article 41

COMPLAINTS

41.1. The Operator shall apply an effective and appropriate system for the processing of complaints submitted by consumers and Players and shall keep a record of these complaints which is directly accessible by the HGC.

41.2. The Operator shall have a relevant complaint form in each Venue and on its website. The complaint form shall include at least the following:

- a. Full name and father's first name;
- b. Date of birth;
- c. Valid ID card or passport number;
- d. Permanent residence address;
- e. Address and response dispatch method; and
- f. Description of incident.

41.3. The Player's complaint shall be submitted the latest within forty-eight (48) hours as of the next day of the incident.

41.4. The complaint shall be mandatorily accompanied by a copy of the ID card or

passport or equivalent document confirming the identity of the complainant.

41.5. The Operator shall examine the information contained in the complaint and inform the complainant of the matters referred to in the complaint within fifteen (15) days of its submission.

41.6. In case the Operator's answer does not satisfy the complainant, he/she may apply for the review of his/her complaint by the HGC, within ten (10) days as of the next day of the notification of the Operator's answer. The application for review by the HGC shall be mandatorily notified to the Operator which shall promptly forward the information relevant to the complaint to the HGC.

Article 42

PROTECTING WINNER IDENTITY

The Operator shall ensure that itself, the Venue Managers and those persons who have an employment relationship, contract for work or retainer arrangement with them, do not publish the identity of persons who participate in the Games or have won or lost any money due to their participation in them, without prior written consent of these persons. Such consent is not required when such information is provided to the HGC or elsewhere as specified in the relevant provisions.

Article 43

PERSONAL DATA

The Operator is subject to the provisions of the General Data Protection Regulation, Law 4624/2019 (Government Gazette 137/A) and Law 2472/1997 (Government Gazette 50/A) and is obliged to take suitable preventive measures so that it is not possible to identify Players using technical or other means that can reasonably be used by third parties. Where the confidentiality of data and/or the duty of confidentiality are breached, the administrative penalties referred to in Article 51 of Law 4002/2011 shall apply.

Article 44

CARE FOR PERSONS WITH
DISABILITIES

The Operator shall comply with the applicable laws and regulations ensuring the accessibility of the Venues by persons with disabilities.

CHAPTER G':

CONFORMITY CHECKS –
ADMINISTRATIVE MEASURES AND
PENALTIES –GAMING AUDIT BODY

Article 45

CONFORMITY CHECKS –
ADMINISTRATIVE MEASURES AND
PENALTIES

The Gaming Regulation shall set out within the framework of the applicable provisions:

- a. The manner, procedure and types of audit exercised;
- b. The manner and the bodies responsible for the confirmation of infringements, the procedure for the collection of fines, the method of payment and the special procedure for enforcing payment;
- c. Specification of the type and amount of administrative penalties imposed by type of infringement or by category of infringement;
- d. The functioning of the Gaming Audit Body.

CHAPTER H':

TRANSITIONAL PROVISIONS

Article 46

TRANSITIONAL PROVISIONS

The Operator shall operate the Intermediate Control System referred to in Article 27 within eighteen (18) months from entry into force of this Regulation. Until the installation and operation of the Intermediate Control System, the Operator shall provide

the HGC with remote access to the systems and subsystems used for conducting Games.

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

This Decision shall be published in the Government Gazette.

Athens, 23 July 2020

The Minister

CHRISTOS STAIKOURAS