

DECISIONS

Number 79292 ΕΞ 2020

Enactment of the Gaming Regulation on Commercial Communication regarding Games of Chance

THE MINISTER OF FINANCE

Having regard to:

1. The provisions of:

a) Articles 25 to 54 of Law 4002/2011 amending the state pension legislation - Arrangements for development and fiscal consolidation – Jurisdictional issues within the remit of the Ministries of Finance, Culture & Tourism and Labour and Social Insurance (Government Gazette 180/A), and in particular the provisions of Article 29(3) as well as those of Articles 189 to 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) (L 119/1 of 4 May 2016);

c) Law 4624/2019 on the protection of personal data, measures to implement the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data, and incorporating Directive (EC) 2016/680 of the European Parliament and of the Council of 27 April 2016 into national law and other provisions (137/A);

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

e) Law 3861/2010 (Government Gazette 112/A) on enhancing transparency through the mandatory posting and disclosure of laws and acts of governmental, administrative and local government authorities on the Internet [the ‘Diavgeia’ (Clarity) Programme] and other provisions, and of Law 3469/2006 (Government Gazette 131/A) on the National Printing Office, Government Gazette and other provisions;

f) Articles 4 to 11 of Law 3471/2006 on the protection of personal data and privacy in the electronic telecommunication sector, and amending Law 2472/1997 (133/A);

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

h) Article 9 of Law 2251/1994 on consumer protection (191/A);

i) Presidential Decree No. 81/2018 on the transposition of Directive (EU) 2015/1535 of the European Parliament and of the Council of 9 September 2015 laying down a procedure for the provision of information in the field of technical regulations and of rules on information society services (consolidated version) and other provisions into Greek law (Government Gazette 151/A);

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

k) Presidential Decree No. 109/2010 on the harmonization of the Greek Broadcasting Legislation with Directive 2010/13/EU (OJ L 95 of 15.4.2010) of the European Parliament and of the Council which codified the provisions of Council Directive 89/552/EEC (OJ L 298 of 17.10.1989) as it was in force after being currently amended by Directive 2007/65/EC (OJ L 332 of 18.12.2007) of the European Parliament and of the Council on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the pursuit of television broadcasting activities (190/A);

l) Article 90 of Presidential Decree No. 63/2005 on the consolidation of law with respect to government and government agencies (Government Gazette 98/A) as currently in force in conjunction with Article 119(22) of Law 4622/2019 (133/A);

m) Joint Decision No. 56660/1679/22.12.2011 of the Ministers of Finance and Culture & Tourism confirming the commencement of the Hellenic Gaming Commission (HGC) operations (HGC) (2910/B);

n) Decision No. 2/63389/0004/21.7.2016 (Government Gazette 397/Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin) of the Minister of Finance on the appointment of a President and two members and renewal of the term in office of other members of the Hellenic Gaming Commission read in conjunction with similar decisions No. 2/3935/0004/24.7.2018 (Government Gazette 428/Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin), No. οικ 9433 ΕΞ 2019/12.2.2019 (Government Gazette 64/Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin) and No. 3557 ΕΞ 2020/14.01.2020 (Government Gazette 20/Special Officials and Management Positions of Public Sector and Wider Public Sector Bodies Bulletin);

o) HGC Decision No. 163/4Γ/9.7.2015 regulating matters on commercial communication regarding games of chance (1824/B);

p) Commission Recommendation No. 2014/478/EU of 14 July 2014 on principles for the protection of consumers and players of online gambling services and for the prevention of minors from gambling online (L214/38 of 19 July 2014);

2.HGC Decision No. 493/3/11.06.2020 recommending to the Minister of Finance the enactment of the Gaming Regulation on Commercial Communication regarding Games of Chance, pursuant to Article 29(3) of Law 4002/2011 (180/A).

(EE) Whereas the provisions recommended by the HGC Decision 493/3/11.06.2020 do not require further notification to the European Commission, pursuant to Directive 2015/1535 of the European Parliament and of the Council of 9 September 2015 (OJ L 241 of 17.9.2015), given that they shall neither extent currently applicable and/or notified restrictions nor introduce new restrictions, barriers or prohibitions related to the access, pursuit, establishment or use of gambling services along with the relevant procedures related to the provision and use of these products and services.

4. The need to regulate matters on the commercial communication related to games of chance.

5. Whereas this decision does not entail any expenditure for the State budget or the HGC budget, we hereby decide to:

Enact the Gaming Regulation on Commercial Communication regarding Games of Chance, as follows:

GAMING REGULATION ON COMMERCIAL COMMUNICATION REGARDING GAMES OF CHANCE

Article 1

DEFINITIONS

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

Excluded Player shall mean a Player who cannot take part in Games of Chance on his/her own initiative or at the request of his or her legal guardian submitted to persons who organise and/or run such Games or court decision or reasoned decision of the Licence Holder;

Licence shall mean the administrative permit issued by the HGC to organize/conduct Games or the granting of a right to organize/conduct Games in any manner by the Greek State to a third party.

Notification shall mean the written information of the HGC as far as the intention of the Licence Holder to change data, under the relevant Regulation, is concerned. Any change which is notified may take place after ten (10) working days following the notification date and given that the HGC, within said time period, has not asked for further information to be forwarded or does not believe otherwise.

Running shall mean conducting a game referred to in Article 25(s) of the Law. Where the provisions of this Decision refer to the concept of ‘Conducting’, they shall also cover the concept of ‘Organisation’ and vice versa;

Organisation shall mean organising a game referred to in Article 25(t) of the Law. Where the provisions of this Decision refer to ‘Organising’, it shall also mean ‘Conducting’ and vice versa;

HGC or Authority shall mean the Hellenic Gaming Commission;

Commercial Announcement shall be any specific announcement which directly or indirectly seeks to market gambling services, and which is implemented in the context of a Commercial Communication plan;

Commercial Communication shall mean any kind of promotion of the organisation and conducting of the Games or of the Licence Holder's image. The concept of Commercial Communication also includes sponsorship, corporate social responsibility and Loyalty Programs;

Corporate Social Responsibility encompasses social and environmental actions taken voluntarily by the Licence Holder, other than the requirements set forth by the law, which aim at contributing to the sustainable economic growth and balance, the strengthening of the society's coherence and the promotion of Responsible Gambling.

Website shall mean a site used by the Licence Holder as a means to conduct Games. It belongs to the Licence Holder and its domain name ends in **gr**.

Commercial Communication Regulation or Regulation shall mean this Regulation regulating matters on the Commercial Communication regarding Games of Chance, and establishing rules governing such activities;

Gaming Regulation is any Ministerial Decision referred to in Article 29(3) of Law 4002/2011 (180/A);

Licence Holder or Holder shall mean the legal person who organises and conducts Games of Chance following a Licence issued by the Hellenic Republic and in all cases the legal person engaged in such activities.

Participation Cost shall mean a minimum wager permitting a person to participate in a Game. It does not include the admission fee payable to enter a casino.

Register shall mean all data maintained by the HGC which are made available on its website.

Instructions shall mean circulars issued by the HGC with guidelines on how to implement the provisions of the Gaming Regulations. These instructions are binding in the Authority's dealings with citizens;

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

Advertising Service Provider shall mean the person who plans and/or organises and/or implements and/or promotes Commercial Communication Actions;

Loyalty Program shall mean a reward program which aims to reward the Holder's Clients by offering gifts or other services in order to influence their behavior;

Affiliates' Points shall mean the websites belonging to the Affiliate;

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

Affiliate or Junket Operator shall mean the person who is registered in the relevant Register and collaborates with the Licence Holder to promote organisation and conducting of Games of Chance in compliance with the terms and conditions set forth in an approved Commercial Communication Plan.

Commercial Communication Plan shall mean a plan to develop and implement Commercial Communication actions approved by the HGC which embodies all activities implemented jointly by the Licence Holder and his/her affiliates to promote the organisation and conducting of Games.

Games of Chance shall mean the games characterized as such pursuant to the provisions in force which are conducted on the basis of a relevant Licence (conducted by a Licence Holder).

Product Placement shall mean any form of audiovisual commercial communication consisting of the inclusion of or reference to a product, service or the trademark thereof so that it is featured within a particular programme in return for payment or for similar consideration.

Responsible Gambling shall mean all provisions of the Gaming Regulations and HGC Instructions 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, in order to minimize consequences for the Players due to their participation in games of chance.

Sponsorship shall mean the contractual relationship between the Licence Holder and the recipient of the sponsorship in the context of which the Licence Holder offers financial support to sport or artistic events/broadcasts/organisations/groups or persons (either an athlete or an artist) in order to establish a relation between the image, trademark or the products belonging to the Licence Holder and the Sponsor in exchange for Commercial Communication or other benefits.

Article 2

SCOPE

2.1. Provisions hereof shall apply to all actions related to the planning and implementation of any kind of Commercial Communication which are implemented by the Licence Holder and his/her affiliates under a Commercial Communication Plan approved by the HGC.

2.2. Any provisions and contractual terms laying down specific restrictions in terms of Commercial Communication regarding Games of Chance shall not be affected by the provisions of this Decision.

Article 3

GENERAL PRINCIPLES

3.1. Participation in Games should be the result of a free and independent personal choice and not the outcome of any action entailing deception, pressing challenge or motivation.

3.2. Commercial Communication shall take place within a tight framework for consumer and Player protection in the field of gambling services and in all cases its use should be rational and strictly limited to these actions deemed necessary to assist users to play Games conducted by Licence Holders and to promote Responsible Gambling.

3.3. Commercial Communications should neither present Games as a normal activity nor promote a positive image of them regarding the fact that part of the proceeds from the Games are intended for public benefit activities.

3.4. The Licence Holder shall draw up a Commercial Communication Plan referred to in paragraph 9.2 hereof and shall be assigned to organise all relevant actions required for its implementation in line with the Principles of Responsible Gambling and the HGC relevant Decisions and Instructions.

3.5. When developing and implementing Commercial Communication actions, they should fully comply with the provisions in force and the HGC relevant Instructions.

3.6. Television commercial announcements shall comply with the provisions of Presidential Decree No. 109/2010 (190/A). Surreptitious advertising is not to be permitted.

3.7. Commercial Announcements shall be recognizable whatever form they may take and regardless of the media used for their display.

3.8. Internal or external advertising shall take place strictly in a place intended to be used only for the stated purpose pursuant to the provisions currently in force.

3.9. In case of outdoor advertising, such places shall be located at a distance of 200 m at a minimum from all primary and secondary education schools and boarding houses.

3.10. Commercial Announcements via radio/television broadcasting shall be displayed within the advertising time length set forth in the applicable provisions.

3.11. Commercial Announcements on the part of the Licence Holders which promote fixed odds Games are not allowed to mention each time fixed odds. By way of exception, Commercial Announcements which mention each time fixed odds shall be permitted where they are displayed on the Licence Holder's website, the Affiliates' Points or appear in sports newspapers -either printed or digital- in printed programmes (online or not), on sports websites as well as in prediction sheets and on relevant sites.

3.12. The concept of Commercial Announcement shall not encompass press releases, given that they do not contain any Commercial Communication material and/or comprise surreptitious advertising.

Article 4

MINOR PROTECTION

Commercial Communication should not:

- a. Target or address minors encouraging them to participate in Games of Chance.
- b. Refer and/or contain elements of the minors' mentality, habits, and behavior and/or use phrases belonging to their communication code.
- c. Harm minors and urge them to believe that Games of Chance are a normal activity during their leisure time.
- d. Present Games of Chance as a socially acceptable activity for the minors.
- e. Present participation in Games of Chance as an activity which marks transition from adolescence to adulthood.
- f. Create characters, either real or virtual, which are or seem to be under the age limit set forth by the law to be the appropriate one for participating in the Games, without prejudice to paragraph 6.6.
- g. Be displayed before, during or right after conducting and/or broadcasting underage sporting events.
- h. Be displayed before, during or right after a radio/television programmes designed for minors.
- i. Be displayed in cinemas before, during or right after the screening of films addressing minors.
- j. Be displayed in any sort of online or not publications and websites mainly addressing minors.

Article 5

SPONSORSHIP

5.1. In case of sponsorship, the following instructions shall apply:

- a. The Licence Holder shall be clearly identifiable as Sponsor.
- b. The name and/or trademark of the Licence Holder, the name and/or trademark of the Game and the name and/or trademark of the Licence Holder's website are allowed to be mentioned.

5.2. Commercial Announcements where the Licence Holder is the Sponsor may use or mention the persons referred to in paragraph 8.3.11.

5.3. Commercial Announcements during which the Licence Holder presents himself/herself as Sponsor should not contain visual or sound elements to promote the fact that either the sponsored or the individuals participating in them take part in Games.

5.4. Any sponsorship addressing minors, underage events as well as school events shall not be permitted.

5.5. Commercial Announcements released by the Licence Holder as Sponsor should be clearly distinguished from all other Commercial Announcements.

Article 6

CORPORATE SOCIAL RESPONSIBILITY (CSR)

6.1. When promoting Corporate Social Responsibility (CSR) actions, only the company name, trademark or the name of the Licence Holder's website shall be mentioned.

6.2. Commercial Announcements promoting Corporate Social Responsibility (CSR) shall strictly contain the action in question and are not allowed to contain references to Games.

6.3. Commercial Announcements promoting Corporate Social Responsibility shall not be confused with other Commercial Announcements.

6.4. Commercial Announcements for the promotion of Corporate Social Responsibility may use or mention the persons referred to in paragraph 8.3.11.

6.5. Provisions of this Article shall also apply to the 'Cultural Sponsorship' as defined and regulated by Law 3525/2007 (16/A), as currently in force.

6.6. Implementation of Corporate Social Responsibility (CSR) actions which concern the support and generally the Licence Holder's contribution to athletes and sportsmen, irrespective of age, and in Sports of Federations supervised by the Greek General Secretariat of Sports.

6.7. Product Placement as part of Corporate Social Responsibility (CSR) actions shall not be allowed.

Article 7

PRODUCT PLACEMENT

7.1. For the purpose of promoting the Organisation and Conduct of Games, Product Placement on broadcasting media shall not be allowed.

7.2. By way of exception, Product Placement for promoting the Organisation and Conduct of Games shall be exclusively allowed in radio and television programmes of sports content, provided that the conditions of Article 12 of Presidential Decree 109/2010 (190/A) are met.

Article 8

TERMS OF COMMERCIAL COMMUNICATION

8.1. Direct Commercial Communication shall be allowed without prejudice to compliance with the provisions of Article 4 on confidentiality of communications and Article 11 on unsolicited communications of Law 3471/2006 (133/A) on the protection of privacy in the field of electronic communications, in combination with the provisions of General Data Protection Regulation [Regulation (EU) 2016/679] and Law 4624/2019 (137/A).

8.2. Direct Commercial Communication is prohibited to persons who are in a state of abstention or exclusion from the Games and for as long as their abstinence or exclusion lasts.

8.3. Commercial Communication shall not be allowed to:

8.3.1. Adopt unfair commercial practices, such as misleading acts and omissions, as well as aggressive commercial practices, pursuant to the provisions of Article 9 of Law 2251/1994 (191/A), as currently in force.

8.3.2. Challenge/ invite the public, in a highly motivating or pressing manner, to participate in the Games.

8.3.3. Present a positive image regarding the fact that part or all of the proceeds from the Games are intended for public benefit activities.

8.3.4. Present Participation in Games as a normal activity.

8.3.5. Take advantage of the lack of expertise of the public or include unfounded statements about the chances of winning or the profits that players can expect from participating in the Games.

8.3.6. Present statistics or findings of studies and research or excerpts from technical and scientific books, etc., in order to give the Games a positive image.

8.3.7. Promote the false impression that the outcome of the Game can be predicted or controlled using any kind of stereotypes, prejudices and superstitions and/ or the impression that their use may contribute, even in part, to the positive outcome of the Game.

8.3.8. Suggest that the frequency of the Player Participation in the Game can positively affect the outcome of the Game.

8.3.9. Suggest that skills can affect the outcome of a Game, when this is not the case.

8.3.10. Promote Participation in Games as a means of financial investment or as a way of enrichment.

8.3.11. Use or refer to persons (real or virtual) who by exercising and/ or relating to activities of general or special interest enjoy publicity and/ or recognition and/ or appeal, thus influencing the formation of opinion and belief and/ or functioning as social and/ or professional and/ or economic success models.

8.3.12. Promote Participation in Games as a criterion of social acceptance, personal or financial success or include statements by public figures or celebrities, from which it appears that Participation in Games contributed to their success or social acceptance.

8.3.13. Suggest that Games can be the solution to social, professional, financial or personal problems.

8.3.14. Suggest that Games can be an alternative to employment.

8.3.15. Suggest that Participation in Games can be a priority in life, before family, friends, professional and educational obligations.

8.3.16. Suggest that Participation in Games can enhance personal qualities, such as improving one's image, boosting self-confidence or being a means of gaining recognition or admiration.

8.3.17. Encourage all forms of discrimination, in particular discrimination based on sex, sexual orientation, ethnic origin, religion, age or disability, and in general insult human dignity.

8.3.18. Link Games to substance use, include or conceal violence, sexual abuse or any relevant suggestion, or incite to illegal activity.

8.3.19. Contain and/ or suggest elements that may lead to antisocial or violent behavior or encourage behavior that is detrimental to health and safety.

8.3.20. Promote, directly or indirectly, the provision of credit to Players for Participation in Games.

8.3.21. Discredit the abstention from Games.

8.4. Competitions or draws organized by the License Holder and displayed to the public shall explicitly and clearly state the means of participation in the competition or draw. All kinds of rewards and prizes of the above competitions or draws may not be related to the conduct of the Games and the winnings resulting from the Participation in the Games.

8.5. Without prejudice to paragraph 8.6, Commercial Announcements may not promote the provision of rewards (bonuses), gifts, benefits and/ or discounts in relation to the cost of Participation in the Games.

8.6. Exceptionally, loyalty programs shall allow Commercial Announcements:

a. Which are made individually to the Players after their consent and/ or are displayed exclusively within the physical space of the Games and/ or on the Website of the Licence Holder and relate to rewards, gifts or other benefits.

b. Which are made to the public, as long as they include the indication ‘Terms and Conditions’, they are limited to what is absolutely necessary to inform about the existence of the loyalty program, without further references to specific Games, and they refer to the content section on the Website of the Licence Holder where the specific terms and conditions of participation in the program are posted.

c. Draws, the participation in which requires the cost of Participation in the Games. These draws are displayed exclusively within the Games venue and/ or on the Licence Holder’s Website.

8.7. Online Commercial Announcements, either in the form of a pop-up window, such as pop-up/ pop-under ads, overlays, etc. or in any other form that restricts and/ or blocks browsing, shall not be allowed.

8.8. The content of the Website of the Licence Holder and the related pages on social media constitute Commercial Communication, are subject to the provisions of the Regulations and mention the Hellenic Gaming Commission (HGC) as the competent regulator, by listing the authority’s website with a hyperlink, as well as the information referred to in paragraph 8.9.

8.9. Every Commercial Announcement shall state:

a. The HGC as the competent regulator.

b. The permissible age limit for Participation in the Game or Games displayed or for access to the venue.

c. The phone lines for receiving help and support services related to gambling addiction.

d. A message warning about the risk of addiction and property loss, as well as a statement that the Games are conducted by the Licence Holder based on the principles of Responsible Gaming.

8.10. In any case of Commercial Announcement that is implemented through the internet and the available space used for its hosting is not sufficient for the integration of all the information of paragraph 8.9, the HGC as the competent regulator, the appropriate age limit for Participation in the Games or for access to the venue, as well as the phone lines for receiving help and support services related to gambling addiction should be mentioned.

8.11. In any case of Commercial Announcement for the promotion of Sponsorship or Corporate Social Responsibility, at least the age limit for Participation in the Games shall be mentioned.

8.12. The play-for-fun games used by the License Holder in the Commercial Announcements shall be subject to the same regulatory provisions as the play-for-money games offered.

Article 9

APPROVAL OF THE COMMERCIAL COMMUNICATION PLAN

9.1. Commercial Communication without the approval of the HGC shall not be allowed.

9.2. The License Holder shall submit the Commercial Communication Plan to the HGC for approval. The Commercial Communication Plan shall be submitted in accordance with the standard guide issued under the HGC Instructions and must include:

- a. the entire content, creative and audiovisual material of the Commercial Announcements. The above material shall be submitted in electronic form, in full development (scripts, samples, models and messages), in the form of an appendix and in a way that clearly shows the creative/ artistic part,
- b. the schedule of actions and the budget,
- c. the media to be used and the estimated number of Commercial Announcements per medium,
- d. list of the Affiliates to provide services during the implementation of the Plan.

9.3. The License Holder is obliged to comply with the HGC Instructions and to provide any information requested by the authority, in the form and manner specified by the latter.

9.4. The HGC may limit the Commercial Announcements in terms of extent, budget and media of implementation and/ or exclude media or forms in order for the Commercial Communication to be implemented in accordance with the legal provisions and Regulations.

9.5. The HGC shall approve the Commercial Communication plan within thirty (30) days from its submission. If Commercial Communication is implemented in violation of the Regulation, or compliance with the legal requirements is not met, the approval granted shall be automatically revoked, regardless of whether administrative sanctions are imposed.

9.6. During the implementation of the approved Plan, amendments concerning points (b) to (d) of paragraph 9.2 shall be notified by the License Holder to the HGC.

9.7. The Advertising Service Providers and Affiliates, before the implementation and/ or the promotion and/ or the advertising of Commercial Communication actions, shall be obliged to request from the License Holders the decision approving the Commercial Communication plan and the approved content of the respective Commercial Announcements, which they are requested to implement and/ or promote and/ or advertise.

Article 10

RECORD KEEPING

10.1. The License Holder is obliged to keep records, data and information related to the implementation of the Commercial Communication, in media that allow their storage, in a form and manner that ensures they are easily accessible by the HGC, in the manner and at the time specified by the latter. In particular, the License Holder shall keep:

- a. The Commercial Communication actions implemented and the respective expenses.
- b. Research and studies conducted on Commercial Communication.

10.2. The Plans, data and information concerning their implementation as well as complaints, grievances, requests or questions of the public regarding the Commercial Communication, the respective response actions and their results, shall be kept for a period of at least five (5) years after the implementation of each Plan.

Article 11

ILLEGAL GAMBLING OPERATORS

11.1. Illegal gambling operators are prohibited from engaging in any Commercial Communication action.

11.2. Advertising Service Providers and their Affiliates are prohibited from providing their services, within the Territory, to illegal gambling operators.

11.3. Violation of the above obligations entails administrative sanctions pursuant to the provisions of the Gaming Regulation on Administrative Measures and Sanctions and the relevant provisions.

Article 12

ADMINISTRATIVE SANCTIONS

Implementation of Commercial Communication in violation of the Regulations and the provisions in force shall incur administrative sanctions pursuant to the provisions of the Gaming Regulation on Administrative Measures and Sanctions.

Article 13

REPEALED PROVISIONS

Following the entry into force of this Decision, the HGC Decision No. 163/4Γ/9.7.2015 (1824/B) shall be repealed.

Article 14

TRANSITIONAL PROVISIONS

14.1. Commercial Communication Plans which at the entry into force of this Decision have been approved by the HGC and are not contrary to the provisions hereof, should be completed, under the Licence Holder's responsibility within six (6) months as of the entry into force of this Decision. After the lapse of the six (6) months, any decision approving a commercial communication Plan shall be automatically revoked and the Licence Holder shall refrain from any relevant action of Commercial Communication.

14.2. Until the issuance of online gaming licences by the HGC, pursuant to Article 45 of Law 4002/2011, the validity of the provision referred to in point a' of paragraph 8.9 shall be suspended and the persons who lawfully provide online gambling services shall mention the HGC as the competent authority assigned to supervise Commercial Communication actions.

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

Minister

CHRISTOS STAIKOURAS