

EXACT COPY

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Hellenic Gaming Commission (HGC)
Independent Authority
Directorate-General for Supervision and Business Operations
Planning, Regulation and Research Directorate
Regulation Department
Contact person: I. Minioti
Tel.: (0030) 211 107 5157
Email: i.minioti@hgc.gov.gr

DECISION

Subject: Issuance of Directive no 4/2023 titled "Guidelines for the application of Article 13 of HGC decision no 554/5 of 15.04.2021 (Government Gazette B 1633) regarding the creation of a Player's Online Account and the authentication and verification of the identity of the Players of games of chance that are conducted via the Player's Online Account".

THE HEAD OF THE PLANNING, REGULATION AND RESEARCH DIRECTORATE

Having regard to:

1. The provisions:

- a. of Articles 16 to 23 of Law 3229/2004 (Government Gazette A 38) on "Supervision of private insurance, supervision and control of games of chance, implementation of International Accounting Standards and other provisions" and, in addition, to the provisions of Law 3051/2002 (Government Gazette A 220) on "Constitutionally enshrined independent authorities, amending and supplementing the public sector recruitment system and related regulations",
- β. of Articles 25 to 54 of Law 4002/2011 (Government Gazette A 180) on "Amendment of the State pension legislation - Arrangements for development and fiscal consolidation - Matters falling under the competence of the Ministries of Finance, Culture and Tourism and Labour and Social Security",
- γ. of Law 4557/2018 on "Prevention and suppression of money laundering from criminal activities and terrorism financing (transposition of Directive 2015/849/EU) and other provisions" (Government Gazette A 139),
- δ. 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 on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119),
- ε. of Law 4624/2019 on "Data Protection Authority, measures for the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and incorporation into national legislation of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 and others provisions"

(Government Gazette A 137),

στ. of Law 4727/2020 (Government Gazette A 184) on "Digital Governance (Transposition to the Greek Law of Directive (EU 2016/2102) and Directive (EU) 2019/1024), Electronic Communications (Transposition to the Greek Law of Directive (EU) 2018/1972) and other provisions, as to Chapter XI "Digital Transparency-DIAVGEIA Program",

2. Decision no 79835 ΕΞ 2020 of 24.7.2020 issued by the Minister of Finance on "Enacting a Gaming Regulation for organizing and conducting online games of chance" (Government Gazette B 3265, correction of errors in Government Gazette B 4441), as amended with similar decisions nos 56604 ΕΞ 2022 of 27.04.2022 (Government Gazette B 2185) and 67663 ΕΞ 2022 of 18.05.2022 (Government Gazette 2483),
3. Decision no 79841 ΕΞ 2020 of 24.7.2020 issued by the Minister of Finance on "Enacting a Gaming Regulation - Technical Specifications for organizing and conducting online games of chance" (Government Gazette B 3266) as amended with similar decision no 58876 ΕΞ 2022 of 04.05.2022 (Government Gazette B 2232),
4. Decision no 79314 ΕΞ 2020 of 23.7.2020 (Government Gazette B 3263) issued by the Minister of Finance on "Enacting a Gaming Regulation for conducting games of chance via Video Lottery Terminal (VLT) gaming machines", as amended with similar decisions nos 13530 ΕΞ 2022 of 02.02.2022 (Government Gazette B 356) and 187634 ΕΞ 2022 of 21.12.2022 (Government Gazette B 6716),
5. Decision no 79823 ΕΞ 2020 of 24.7.2020 (Government Gazette B 3264) on "Enacting a Gaming Regulation - Technical Specifications for conducting games of chance via Video Lottery Terminal (VLT) gaming machines", as amended with similar decision no 59054 ΕΞ 2023 of 12.04.2023 (Government Gazette B 2567),
6. Decision no 56580 ΕΞ 2022 of 27.04.2022 (Government Gazette B 2166) issued by the Minister of Finance on "Amendment and codification of decision no 79305 ΕΞ 2020 of 23.7.2020 issued by the Minister of Finance on "Enacting a Gaming Regulation - Eligibility of Persons" (Government Gazette B 3262, correction of errors in Government Gazette B 4441),
7. Decision no 125944 ΕΞ 2020 of 4.11.2020 (Government Gazette B 4884) issued by the Minister of Finance on "Enacting a Gaming Regulation - Administrative Measures and Sanctions",
8. Decision no 145940/ΕΞ 2020 of 21.12.2020 (Υ.Ο.Δ.Δ. 1089) issued by the Minister of Finance, together with similar decisions nos 2/63389/0004 of 21.07.2016 (Υ.Ο.Δ.Δ. 397), 2/3935/0004 of 24.07.2018 (Υ.Ο.Δ.Δ. 428), οik. 9433 ΕΞ 2019 of 13.02.2019 (Υ.Ο.Δ.Δ. 64), 3557 ΕΞ 2020 of 14.01.2020 (Υ.Ο.Δ.Δ. 20) and 145940/ΕΞ 2020 of 21.12.2020 (Υ.Ο.Δ.Δ. 1089).
9. HGC decision no. 37/4 of 21.09.2023 (Government Gazette B 6052) titled "Approval of Regulation for the Organisation, Structure and Operation of Service Units of the HGC and amendment to HGC decision no 11/3 of 03.04.2023 (Government Gazette B 2704)".
10. Decision no 23011 of 23.10.2023 (Online publication no.: 6ΩΩΠΙΜΑ-ΥΥΣ) issued by the President of the HGC, based on which tasks attached to positions of responsibility in HGC Service Units were assigned to HGC employees.
11. Decision no. 12970 of 01.12.2020 (Government Gazette 5651) issued by the President of the HGC on "Transfer of powers, with exercise thereof in parallel, to Heads of Service Units of the Hellenic Gaming Commission".
12. HGC Decision no 554/5 of 15.04.2021 on "Issuance of Regulation for the implementation of measures to combat money laundering from criminal activities and terrorism financing by the Parties Responsible in the gaming market, pursuant to sub-

par. (f), Article 28(3) of Law 4002/2011 (Government Gazette 180)” (Government Gazette B 1633), in particular Article 26.

13. The need to issue an HGC Directive to provide uniform guidelines for the proper implementation of Article 13 of HGC Decision no 554/5 of 15.04.2021 (Government Gazette B 1633) on “Issuance of Regulation for the implementation of measures to combat money laundering from criminal activities and terrorism financing by the Parties Responsible in the gaming market, pursuant to sub-par. (f), Article 28(3) of Law 4002/2011 (Government Gazette A 180)”.
14. The fact that this decision is not at the expense of the Hellenic Gaming Commission budget.

We hereby decide as follows:

A Directive is issued to provide guidelines on the implementation of Article 13 of HGC decision no 554/5 of 15.04.2021 (Government Gazette B 1633) regarding the creation of a Player's Online Account and the authentication and verification of the identity of Players of games of chance that are conducted via the Player's Online Account, as follows:

DIRECTIVE 4/2023

Guidelines on the proper implementation of Article 13 of HGC decision no 554/5 of 15.04.2021 (Government Gazette B 1633) regarding the creation of a Player's Online Account and the authentication and verification of the identity of Players of games of chance that are conducted via the Player's Online Account.

1. Definitions

For the purposes of this decision, the words or phrases below shall be assigned the following meaning:

Excluded player means the person under sub-par. XVI of Article 25, Law 4002/2011 (Government Gazette A 180).

HGC or Authority means the Hellenic Gaming Commission.

Player's Online Account means the unique account assigned by the License Holder to each player for their participation in one or more games, pursuant to the provisions under sub-par. XV of Article 25 of Law 4002/2011 (Government Gazette A 180).

Roaming Online Account means the unique account assigned by the License Holder to each player for their participation in one or more games, pursuant to the provisions under Article 14 of the Regulation.

Regulation means the HGC decision no 554/5 of 15.04.2021 (Government Gazette B 1633) on “Issuance of Regulation for the implementation of measures to combat money laundering from criminal activities and terrorism financing by the Parties Responsible in the gaming market, pursuant to sub-par. (f), Article 28(3) of Law 4002/2011 (Government Gazette A 180)”.

License Holder means the legal entity which has been granted a Licence to Organize and Conduct Games of Chance or has been granted the right to Organise and Conduct Games of Chance by the Greek Government in any legal way, regardless of the medium, time, method and network of provision, promotion and distribution of the relevant services for the Organisation and Conduct of Games.

Excluded Persons Register means the entire body of information kept by HGC on excluded players who may not participate in games of chance via a Player's Online Account for so long as their name is entered in said register.

Players Register means the entire body of information kept by the License Holder on the Players for whom it has created Online Accounts.

Player means the natural person who has a Player's Online Account.

Citizen Personal Number means the number assigned to natural persons pursuant to Article 11 of Law 4727/2020 (Government Gazette A 184).

Participation means the entry of a Player's information/choices in each game of chance and the validation of this entry through the payment of a fee.

2. Purpose - Scope

2.1. This decision provides guidelines on the implementation of Article 13 of the Regulation with regard to the creation of a Player's Online Account and the authentication and verification of the Player's identity.

2.2. This decision shall apply to all Holders of Licenses for the Conduct of Games of Chance via Player's Online Accounts, according to the legislative and regulatory framework governing the conduct of the above games of chance.

3. Documentation for the creation of a Player's Online Account

3.1. Until a Citizen Personal Number is issued and implemented, the only identification documents of a person requesting the creation of a Player's Online Account shall be their identity card or military identity card or law enforcement identity card and their passport. Without prejudice to par. 3.2, the passport shall be also required as the only identification document of foreign persons from a country of origin other than an EU/EEA Member State who reside legally in Greece and do not hold the above documents issued by the Hellenic Republic, as well as of foreign persons from a country of origin other than an EU/EEA Member State who reside permanently in a foreign country and request the creation of a Roaming Online Account.

3.2. Identification documents of foreign persons, apart from the passport, shall be accepted on the following conditions that must be met cumulatively:

- α. such documents are equal to the ones set forth in par. 3.1, issued by the respective competent authority of an EU/EEA Member State and
- β. such documents shall specify and verify accurately, either individually or jointly, the minimum information required to identify a person pursuant to paragraph 4.1

4. Fields comprised in the Players Register and in the registration form

4.1. License Holders shall keep a players register, which shall comprise the following minimum fields:

- 4.1.1. Surname
- 4.1.2. First name
- 4.1.3. Citizenship/Nationality
- 4.1.4. Number of identification document under Article 3
- 4.1.5. Country of issue of identification document
- 4.1.6. Expiry date of identification document (if stated in the identification document. Otherwise, the value "01-01-2999" shall be selected which needs to correspond to the indication "Indefinite Term".)

- 4.1.7. Birth date
- 4.1.8. Email address
- 4.1.9. Home address in Greece (Street and number)
- 4.1.10. City
- 4.1.11. Postal code
- 4.1.12. Country of permanent residence
- 4.1.13. Citizen Personal Number (as of when it enters into full effect)
- 4.2. License Holders shall provide the persons applying for the creation of a Player's Online Account with a registration form, which shall include the following minimum fields:
 - 4.2.1. Surname
 - 4.2.2. First name
 - 4.2.3. Number of identification document under Article 3
 - 4.2.4. Birth date
 - 4.2.5. Email address
 - 4.2.6. Home address in Greece (Street and number)
 - 4.2.7. City
 - 4.2.8. Postal code
 - 4.2.9. Country of permanent residence (optional)
- 4.3. Completion of the above fields, except for the field under par. 4.2.9, is required for the creation of a Player's Online Account. Otherwise, the creation of a Player's Online Account shall not be possible.
- 4.4. Where a Player's Online Account is to be created for participation in the games of chance under Article 39 of Law 4002/2011 (Government Gazette A 180), the License Holder shall include in the registration form a mobile phone field (required) and an email address field (optional).

5. Field specifications and Players Register format

5.1. When registering the information of a person applying for the creation of a Player's Online Account, as outlined in Article 6 of the present decision, the License Holder shall ensure that:

5.1.1. The name and surname shall be entered in Latin upper case characters, as indicated in the identification document. In the case of characters not belonging to the Latin alphabet, the transcription shall be based on the EL0T-743 standard. Any double name or surname shall be entered without spaces with only a hyphen (-) separator and where the system does not support the hyphen (-), a space shall be used.

5.1.2. The dates of birth and expiry of the identification document shall be formatted as dd-mm-yyyy. In particular, with regard to the field "Identification document expiry date", the option "01-01-2999" shall be also offered, which needs to correspond to the indication "Indefinite Term" that is selected where no expiry date is indicated in the respective identification document.

5.1.3. The number of the identification document shall be entered with upper case Latin characters (in its alphabetical part), without spaces between its numerical and alphabetical parts. In the event of characters that do not exist in the Latin alphabet, the transcription of the alphabetical part shall be based on the EL0T 743 standard.

5.1.4. The country of issue of the identification document shall be entered using the three-digit ISO code (ISO 3166-1, alpha 3 code) of each country.

5.1.5. The email address shall be entered with no spaces.

5.1.6. With regard to the Citizen Personal Number, the technical specifications for its application are expected to be provided by the Greek State.

5.1.7. Fields comprising alphabetical characters shall be completed with upper case letters, except for the email address.

5.1.8. The formatting and other technical details of the Players Register as well as the registration form model shall be outlined in the Appendix, which is an integral part hereof.

6. Authentication and verification of the Player's identity (KYC)

6.1. Through their specialized personnel, License Holders shall see to the authentication and verification, without delay, of the identity of each new Player according to the provisions of the Regulation and shall ensure that:

6.1.1. The information provided by said person belongs to an actual person based on documents, data and information by a competent Authority/Body.

6.1.2. The person in whose name the Player's Online Account is created shall be the same person who applies for registration.

6.1.3. The person participating in the games of chance through a Player's Online Account shall be the actual person whose information has been submitted based on the requirement under paragraph 6.1.1.

6.2. Within the context of the above requirements, the License Holders shall:

6.2.1. See without delay to the information entered in the registration form by the person applying for the creation of a Player's Online Account being cross-checked against the information in the identification document produced by the same person, taking into account field specifications as provided for in Article 4.

6.2.2. Apply a combined username-password use.

6.2.3. Apply procedures and practices for the verification of the Player's information through third sources, according to the provisions of Appendix I of the Regulation, such as:

6.2.3.1. Confirming the Player's contact details through the submission of documentation such as phone, power, water supply bills etc.

6.2.3.2. Verifying that the Player keeps a payment account in their name.

6.3. In case of doubt regarding the adequacy of the Player's identification information, further evidence shall be requested.

6.4. The necessary information and documentation for the authentication and verification of a new Player's identity shall be collected within thirty (30) days as of creation of the Player's Online Account. Until expiry of the afore-stated time limit, the Account shall be considered provisional. If the thirty(30)-day time limit expires and the Player's identity is not verified, the License Holders shall:

6.4.1. Block the Player's Online Account and stop accepting any transactions with the Player;

6.4.2. Notify the Player that their Player's Online Account is being blocked; and

6.4.3. Implement the procedure set forth in paragraphs 13.3 to 13.7 of the Regulation.

7. Updating the Players Register

7.1. License Holders shall update the Players Register pursuant to the provisions of Articles 4 and 5, within the time limits prescribed in Article 9.

7.2. The update under paragraph 7.1 shall concern the following minimum fields: "Surname", "First name", "Birth date", "Identification document number" and "Email address", or "Mobile phone number" in the event of a Player's Online Account participating in the games of chance under Article 39 of Law 4002/2011 (Government Gazette A 180).

7.3. License Holders must take all necessary measures to identify any errors and double entries of the same person and, in general, inconsistencies and discontinuities in the data they keep, and adapt and validate such data in the most reliable and ethical manner, in a way that:

7.3.1. The License Holder keeps a single entry per person registered in the Players Register.

7.3.2. The information kept with the Players Register is consistent with the supporting documentation produced by the Player.

7.4. Where an identification document is no longer valid, a new one must be produced, pursuant to the provision of par. 3.1. Unless the Player produces a valid identification document within 30 days as of the License Holder's request for an updated document, the License Holder shall automatically place the Player's Online Account into a Player's Provisional Account state and the respective provisions of the Regulation shall apply *mutatis mutandis*.

8. Required actions

8.1. For the implementation of this decision, License Holders shall be required to proceed with the following actions, in order of priority, as set out below:

8.1.1. Adjustment of the registration form – application for the creation of a Player's Online Account.

8.1.2. Authentication and verification of identity of each New Player, pursuant to the provisions of the Regulation and this decision.

8.1.3. Review of the information already entered in the Players Register that needs to be updated pursuant to par. 7.2.

8.1.4. Inclusion in the Players Register of the Citizen Personal Number (when it enters into effect).

9. Time of implementation

9.1. The License Holder shall apply the present Directive to:

9.1.1. New applications for the creation of Player's Online Accounts, at the latest within four (4) months as of the effective date of the present.

9.1.2. Existing entries in the Players Register which are excluded and, as a minimum, to the fields under pr. 7.2, further taking into account Article 3, at the latest within six (6) months as of the effective date of the present.

9.1.3. Existing entries in the Players Register that do not fall within the scope of the cases under paragraphs 9.1.1. and 9.1.2. and, as a minimum, to the fields under par. 7.2., further taking into account Article 3, at the latest within nine (9) months as of the effective date of the present.

9.1.4. Without delay, upon submission of an exclusion request as of expiry of the time limit prescribed in par. 9.1.2., and in the event that the player has not sent all the information, with any information that is available at the time of implementation. In this case, the relevant entry shall include an indication that this is an unidentified Player.

9.2. Upon entry into effect of the Excluded Persons Register kept with the HGC, the License Holder , shall notify the Player, in accordance with the relevant guidelines provided by the Authority, of the consequences of the registration and the finalization thereof in the Excluded Persons Register kept with the HGC.

9.3. Any additional requirements for the creation and keeping of the Player's Online Account set forth by the Gaming Regulation shall not be affected by the provisions hereof.

10. Entry into force

This decision shall enter into force upon being posted on DIAVGEIA site.

The Head of Directorate

Dimitrios Papadopoulos

APPENDIX TO DIRECTIVE 4/2023

1. Field specifications and Players Register format

Field	Type of Field	Special notes
Surname	Text	Latin upper case characters, as stated in the identification document. In the case of characters not belonging to the Latin alphabet, the transcription shall be based on the ELOT-743 standard.
First name	Text	Latin upper case characters, as stated in the identification document. In the case of characters not belonging to the Latin alphabet, the transcription shall be based on the ELOT-743 standard.
Citizenship/Nationality	Text	Upper case characters
Number of identification document under Article 3	Text	Latin upper case characters (in the alphabetical part), without spaces between the numerical and the alphabetical parts. In the event of characters that exist only in the Greek alphabet, the transcription of the alphabetical part shall be based on the ELOT 743 standard.
Country of issue of identification document	Text	The three-digit ISO code (ISO 3166-1, alpha 3 code) of each country.
Expiry date of identification document	Date/Text	dd/mm/yyyy or the value "01-01-2999" where the effective term is indefinite
Birth date	Date	dd-mmm-yyyy
Email address and/or mobile phone (for the games of chance under Article 39 of Law 4002/2011 (Government Gazette A 180))	Text	Latin lower case characters with no spaces (email)
Home address in Greece ¹	Text	Street and number Upper case characters
City	Text	Upper case characters
Postal code	Text	No spaces
Country of permanent residence	Text	Upper case characters
Citizen Personal Number (when it enters into effect)	Text	In accordance with the specifications for its application in the new identity cards

¹The values in the fields "Home address in Greece" shall also include cases of foreign players temporarily residing in Greece who have a country of permanent residence other than Greece.

2. Registration form model for the creation of a Player's Online Account

1. Email address or mobile phone (for the games of chance under Article 39 of Law 4002/2011 (Government Gazette A 180)*)

e.g. *konspanag@yahoo.com*

2. Surname *

e.g. *PANAGOPOULOS or PANAGOPOULOS-DOGANIS*

3. Name *

e.g. *KONSTANTINOS or KONSTANTINOS-PANAGIOTIS*

4. Birth Date*

e.g. *16-04-1995*

5. Passport/identity card number *

e.g. *AR253215*

6. Home address in Greece *

e.g. *AGIAS EIRINIS 3*

7. City *

e.g. *ATHENS*

8. Postal code *

e.g. *10439*

9. Country of permanent residence

e.g. *GREECE or ENGLAND*